

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

~~~~~

IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804

Judge Dan Aaron

This document relates to: Polster

The County of Cuyahoga v. Purdue  
Pharma L.P., et al.  
Case No. 18-OP-45090

~~~~~

Videotaped deposition of
DONALD GEROME

November 14, 2018

9:01 a.m.

Taken at:

Kelley & Ferraro, LLP
950 Main Avenue, Suite 1300
Cleveland, Ohio

Renee L. Pellegrino, RPR, CLR

1 APPEARANCES:

2 On behalf of Cuyahoga County:

Napoli Shkolnik PLLC

3 SALVATORE C. BADALA, ESQ.

360 Lexington Avenue

4 New York, New York 10017

(844) 230-7676

5 sbadala@napolilaw.com

- and -

6 Plevin & Gallucci

FRANK GALLUCCI, III, ESQ.

7 ROBIN WILSON, ESQ.

55 Public Square

8 Suite 2222

Cleveland, Ohio 44113-1901

9 (216) 861-0804

fgallucci@pglawyer.com

10 rwilson@pglawyer.com

11 On behalf of Walmart, Inc.:

Jones Day

12 CHRISTOPHER M. McLAUGHLIN, ESQ.

North Point, 901 Lakeside Avenue

13 Cleveland, Ohio 44114-1190

(216) 586-3939

14 cmmclaughlin@jonesday.com

15 On behalf of Endo Pharmaceuticals, Inc., Endo

Health Solutions, Inc., Par Pharmaceuticals,

16 Inc. and Par Pharmaceutical Companies, Inc.:

Arnold & Porter, Kaye Scholer LLP

17 SAMUEL LONERGAN, ESQ.

250 West 55th Street

18 New York, New York 10019-9710

(212) 836-8000

19 samuel.longergan@arnoldporter.com

20 ~ ~ ~ ~ ~

1 APPEARANCES, CONT'D:

2 On behalf of AmerisourceBergen Drug Corporation:

(Via Veritext Virtual Stream)

3 Reed Smith LLP

JAMES A. PETKUN, ESQ.

4 Three Logan Square

1717 Arch Street - Suite 3100

5 Philadelphia, Pennsylvania 19103

(215) 851-8100

6 jpetkun@reedsmith.com

7 On behalf of Cardinal Health:

Williams & Connolly

8 WILL HAWKINS, ESQ.

725 Twelfth Street, N.W.

9 Washington, D.C. 20005

(202) 434-5421

10 whawkins@wc.com

11 On behalf of McKesson Corporation:

Covington & Burling LLP

12 BENJAMIN C. BLOCK, ESQ.

JOHN W. ZIPP, ESQ.

13 One CityCenter

850 Tenth Street, NW

14 Washington, D.C. 20001-4956

(202) 662-2000

15 bblock@cov.com

jzipp@cov.com

16 On behalf of Mallinckrodt:

17 (Via Telephone and Veritext Virtual Stream)

Ropes & Gray

18 HAYDEN MILLER, ESQ.

1211 Avenue of the Americas

19 New York, New York 10036-8704

(212) 695-9000

20 hayden.miller@ropesgray.com

21 ~ ~ ~ ~ ~

1 APPEARANCES, CONT'D:

2 On behalf of Teva Pharmaceuticals:

(Via Telephone and Veritext Virtual Stream)

3 Morgan, Lewis & Bockius LLP

LIZA B. FLEMING, ESQ.

4 1701 Market Street

Philadelphia, Pennsylvania 19103-2921

5 (215) 963-5000

liza.fleming@morganlewis.com

6

7 ALSO PRESENT: Kurt Henschel, Videographer

8

~ ~ ~ ~ ~

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

TRANSCRIPT INDEX

APPEARANCES	2
INDEX OF EXHIBITS	6
INDEX OF OBJECTIONS	7
EXAMINATION OF DONALD GEROME:	
BY MR. BLOCK	12
BY MR. LONERGAN	219
BY MR. MCLAUGHLIN	231
AFTERNOON SESSION	
REPORTER'S CERTIFICATE	238
EXHIBIT CUSTODY - RETAINED BY COURT REPORTER	

INDEX OF EXHIBITS

Number	Description	Marked
Exhibit 1	Cuyahoga County Sheriff's Department Organizational Chart	61
Exhibit 2	E-Mail String Beginning Bates Number CUYAH_00018717	150
Exhibit 3	Cuyahoga County Sheriff's Department 2015 Annual Report	164
Exhibit 4	Cuyahoga County Sheriff's Department 2016 Annual Report	168
Exhibit 5	Cuyahoga County Sheriff's Department Newsletter dated April 2017 Beginning Bates Number CUYAH_000118584	171
Exhibit 6	E-Mail String Beginning Bates Number CUYAH_000118362	185
Exhibit 7	2017-2018 Cuyahoga County Strategic Plan Project List - Community Safety and Protection	217

INDEX OF OBJECTIONS

1		
2		
3	Objection	14
	Objection	17
4	Objection	21
	Objection	22
5	Objection	24
	Objection	25
6	Objection	26
	Objection	32
7	Objection	34
	Objection	35
8	Objection	36
	Objection	38
9	Objection	39
	Objection	41
10	Objection	41
	Objection	43
11	Objection	44
	Objection	44
12	Objection	44
	Objection	48
13	Objection	48
	Objection	49
14	Objection	50
	Objection	51
15	Objection	52
	Objection	52
16	Objection	55
	Objection	56
17	Objection	59
	Objection	64
18	Objection	66
	Objection	69
19	Objection	69
	Objection	70
20	Objection	70
	Objection	73
21	Objection	73
	Objection	82
22	Objection	90
	Objection	93
23	Objection	103
	Objection	103
24	Objection	107
	Objection	108
25	Objection	111

INDEX OF OBJECTIONS, CONT'D

1		
2		
3	Objection	112
	Objection	113
4	Objection	113
	Objection	114
5	Objection	114
	Objection	116
6	Objection	116
	Objection	121
7	Objection	131
	Objection	131
8	Objection	131
	Objection	131
9	Objection	132
	Objection	135
10	Objection	139
	Objection	141
11	Objection	142
	Objection	142
12	Objection	145
	Objection	145
13	Objection	145
	Objection	145
14	Objection	146
	Objection	146
15	Objection	146
	Objection	147
16	Objection	148
	Objection	148
17	Objection	149
	Objection	149
18	Objection	152
	Objection	153
19	Objection	153
	Objection	153
20	Objection	153
	Objection	154
21	Objection	155
	Objection	155
22	Objection	157
	Objection	158
23	Objection	158
	Objection	159
24	Objection	159
	Objection	160
25	Objection	160

INDEX OF OBJECTIONS, CONT'D

1		
2		
3	Objection	162
	Objection	162
4	Objection	173
	Objection	174
5	Objection	175
	Objection	175
6	Objection	176
	Objection	177
7	Objection	177
	Objection	179
8	Objection	180
	Objection	182
9	Objection	183
	Objection	189
10	Objection	189
	Objection	191
11	Objection	194
	Objection	195
12	Objection	195
	Objection	196
13	Objection	196
	Objection	197
14	Objection	197
	Objection	199
15	Objection	200
	Objection	201
16	Objection	202
	Objection	203
17	Objection	203
	Objection	204
18	Objection	204
	Objection	204
19	Objection	204
	Objection	205
20	Objection	205
	Objection	206
21	Objection	206
	Objection	207
22	Objection	207
	Objection	207
23	Objection	208
	Objection	208
24	Objection	208
	Objection	209
25	Objection	209

1	INDEX OF OBJECTIONS, CONT'D	
2		
3	Objection	209
	Objection	210
4	Objection	210
	Objection	210
5	Objection	211
	Objection	211
6	Objection	212
	Objection	212
7	Objection	215
	Objection	217
8	Objection	220
	Objection	220
9	Objection	220
	Objection	220
10	Objection	221
	Objection	221
11	Objection	222
	Objection	222
12	Objection	222
	Objection	222
13	Objection	223
	Objection	223
14	Objection	225
	Objection	225
15	Objection	226
	Objection	226
16	Objection	227
	Objection	227
17	Objection	227
	Objection	227
18	Objection	228
	Objection	228
19	Objection	229
	Objection	229
20	Objection	229
	Objection	230
21	Objection	232
22		
23		
24		
25		

1 THE VIDEOGRAPHER: We're on the
2 record at 9:01. Today's date is November 14th,
3 2018. This is the matter of National
4 Prescription Opiate Litigation. We're here in
5 Cleveland, Ohio.

6 Would counsel please identify
7 themselves for the record?

8 MR. BLOCK: Did you guys start?

9 MR. BADALA: Salvatore Badala,
10 Napoli Shkolnik, for the Plaintiff.

11 MR. GALLUCCI: Frank Gallucci,
12 Plevin & Gallucci, for Plaintiff, Cuyahoga
13 County.

14 MS. WILSON: Robin Wilson, of
15 counsel, Plevin & Gallucci, on behalf of
16 Plaintiff, Cuyahoga County.

17 MR. BLOCK: Good morning. Ben Block
18 and John Zipp of Covington & Burling LLP on
19 behalf of McKesson Corporation.

20 MR. LONERGAN: Sam Lonergan with
21 Arnold & Porter, Kaye Scholer, on behalf of
22 Defendants Endo and Par.

23 MR. McLAUGHLIN: Chris McLaughlin
24 from Jones Day on behalf of Walmart.

25 MR. HAWKINS: Will Hawkins from

1 William & Connolly on behalf of Cardinal Health.

2 MR. BLOCK: Is there anyone on the
3 phone?

4 MR. MILLER: Hayden Miller, Ropes &
5 Gray, on behalf of Mallinckrodt.

6 MR. BLOCK: Anybody else? All those
7 not present, say aye. Okay.

8 THE VIDEOGRAPHER: The witness may
9 be sworn.

10 DONALD GEROME, of lawful age, called for
11 examination, as provided by the Federal Rules
12 of Civil Procedure, being by me first duly
13 sworn, as hereinafter certified, deposed and
14 said as follows:

15 EXAMINATION OF DONALD GEROME

16 BY MR. BLOCK:

17 Q. Good morning. Could you please
18 state your full name for the record?

19 A. Yes. Donald Gerome. Last name is
20 spelled G-e-r-o-m-e.

21 Q. And what is your -- where do you
22 work?

23 A. Right now I work for the Cuyahoga
24 County Sheriff's Department as a captain.

25 Q. What is the business address where

1 you work?

2 A. 1215 West 3rd, Cleveland, Ohio,
3 44113.

4 Q. And where do you live?

5 A. I live in Mayfield Heights, which is
6 a suburb of Cleveland.

7 Q. And, Captain Gerome, you understand
8 that you're under oath, the same oath that would
9 apply as if you were testifying in a court of
10 law?

11 A. Yes, I do.

12 Q. And is there any reason that you
13 can't give truthful testimony today?

14 A. No, there's not.

15 Q. Have you testified at a deposition
16 before?

17 A. No, I've not.

18 Q. Have you testified in court before?

19 A. Yes, I have.

20 Q. How many times?

21 A. A handful of times. I'm not sure
22 how many.

23 Q. In what types of matters have you
24 testified?

25 A. Some had to deal with drug offenses,

1 and there was a couple of OVIs, operating
2 vehicle, influence.

3 Q. When is the first time you testified
4 in court?

5 A. As a detective or as law
6 enforcement?

7 Q. Ever.

8 A. Oh, ever. I don't remember the
9 exact year.

10 Q. Have you ever testified in court
11 other than in your role as a law enforcement
12 officer?

13 A. No.

14 Q. All right. So do you remember
15 roughly when your first testimony would have
16 been?

17 MR. BADALA: Objection to form.

18 Q. '90s, 2000s?

19 A. I came in law enforcement in 2001,
20 so it was probably early 2000s.

21 Q. And did you do anything to prepare
22 for your deposition today?

23 A. Yes, I did.

24 Q. What did you do?

25 A. I met with the attorneys yesterday.

1 Q. With whom did you meet?

2 A. Sal, Frank.

3 Q. Okay. Anybody else present?

4 A. I forget his name. There was
5 another attorney there.

6 Q. Okay. And how long was the meeting?

7 A. Approximately three hours.

8 Q. Did you review any documents?

9 A. Yes.

10 Q. Did you review any documents that
11 helped refresh your recollection of events?

12 A. No.

13 Q. All right. Do you recall how many
14 documents you reviewed?

15 A. No.

16 Q. Types of documents that you
17 reviewed?

18 A. Some e-mails.

19 Q. Anything else?

20 A. No.

21 Q. Have you talked to anyone else in
22 terms of preparing for this deposition?

23 A. For preparation, no. I did advise
24 my supervisor and my subordinate where I'd be
25 today.

1 Q. Who is your supervisor?

2 A. Chief George Taylor.

3 Q. Is he the --

4 A. He's deputy chief.

5 Q. -- deputy chief? Okay.

6 A. Or chief deputy. I'm sorry. Yeah.

7 Q. And we'll have to -- I'll have to
8 work on it, too. We'll have to do our best not
9 to talk over one another.

10 A. Okay. Sorry about that.

11 Q. No. You're good.

12 And who is your subordinate?

13 A. Lieutenant Miguel Caraballo.

14 Q. Have you ever -- we talked about
15 testimony in court. Have you ever testified
16 before an administrative body of any sort?

17 A. I've testified in administrative
18 hearings for the department.

19 Q. In what sorts of manner?

20 A. Disciplinary hearings.

21 Q. Where a member of the force is
22 subject to discipline for something?

23 A. Was removed from his position and
24 was getting the job back or trying to get his
25 job back.

1 Q. How many times have you testified in
2 those sorts of things?

3 A. Two, I believe.

4 Q. Have you ever testified before any
5 legislative body of the state, city or county,
6 like a city council, county board, state
7 legislature, anything like that?

8 MR. BADALA: Objection to form.

9 A. I've been in front of city -- or
10 county council. I don't know if you call it
11 testifying.

12 Q. Okay. What have you -- what have
13 you been in front of city council about?

14 A. Well, county.

15 Q. Excuse me. County council.

16 A. Requesting maybe some equipment,
17 something like that.

18 Q. Have you ever been in front of
19 county council asking for or talking about
20 anything related to opioids?

21 A. No, I have not.

22 Q. All right. Where are you from
23 originally?

24 A. I grew up in South Euclid.

25 Q. And could you -- did you go to

1 college?

2 A. No, I did not.

3 Q. And when did you join the sheriff's
4 department?

5 A. Originally I was hired as a
6 correction officer in 1995. I put myself
7 through the Ohio Police Academy and became a
8 deputy sheriff in 2001.

9 Q. So from 1995 through 2001 you worked
10 as a corrections officer?

11 A. Yes.

12 Q. And what were your responsibilities
13 there?

14 A. As corrections?

15 Q. Yes.

16 A. Supervising the inmates.

17 Then I moved on to what they call a
18 specialty area, which is booking inmates in,
19 releasing, stuff like that.

20 Q. And then how did it -- what did you
21 have to do to become a member of the --

22 A. Law enforcement?

23 Q. Thank you.

24 A. There's a -- police academy
25 basically. I went part-time police academy

1 through Tri-C.

2 Q. Tri-C stands for what?

3 A. I'm sorry.

4 Q. That's fine.

5 A. Cuyahoga County Community College.

6 Q. Okay. Sorry. And so how long did
7 that --

8 A. That was about six months.

9 Q. All right. And you obviously
10 graduated there?

11 A. Yes.

12 Q. And so then you say you became a law
13 enforcement officer in 2001?

14 A. Yes.

15 Q. And what was your -- did you have a
16 rank?

17 A. Deputy sheriff.

18 Q. Okay. And what is your current
19 rank?

20 A. Captain.

21 Q. That's higher than deputy sheriff?

22 A. Yes, it is.

23 Q. All right. And what have been the
24 various ranks you've held between deputy sheriff
25 to captain?

1 A. In 2007 I was promoted to sergeant,
2 in 2014 I was promoted to lieutenant, and in May
3 of 2016 I was promoted to captain.

4 Q. Have you received law enforcement
5 training other than through the -- did you call
6 it a boot camp?

7 A. The police academy.

8 Q. The policy academy. Thank you.

9 A. It's -- the Ohio Peace Officer
10 Training Academy is the official name of it.

11 I'm sorry. Repeat the question,
12 please.

13 Q. Do you have law enforcement training
14 other than through the peace officer academy?

15 A. Yes. Yes, I do.

16 Q. Please describe that for me.

17 A. There's various training throughout
18 my career I've been to, whether it's been at
19 schools or online courses, what they offer now.

20 If I could just start off, I went
21 through the DEA basic narcotic investigation
22 school, which was a three-day school.

23 Q. When did you do that?

24 A. Back in 2000 -- around 2005.

25 Q. Why did you do that?

1 A. I was assigned to the narcotic
2 division within our department.

3 Q. All right. And I cut you off. So
4 you did the DEA course?

5 A. Yeah.

6 Q. What other courses have you done?

7 A. You know, I don't remember every
8 course, but we have continuous training in our
9 department. Most recently I went through first
10 aid training, the trauma training, scenario
11 training. It's continuous. Every year
12 basically you're training. Like I said, the
13 Attorney General offers classes online. It's
14 called EOPOTA, electronic training, that you can
15 just pull up on your computer and get certified
16 in various things.

17 Q. Other than the DEA course, have you
18 taken any training courses that focused on
19 narcotics?

20 MR. BADALA: Objection to form.

21 A. I don't remember any more.

22 Q. As a corrections officer, did you
23 have any involvement with any narcotic-related
24 issues?

25 MR. BADALA: Objection to form.

1 A. No.

2 Q. Do you know as -- for example, when
3 you were a corrections officer, do you know
4 if -- was that at the county jail? Where did
5 you work?

6 A. Yes. It was for the same
7 department, Cuyahoga County Sheriff's
8 Department.

9 Q. So how long are the people who are
10 in that facility -- how long are they in for?

11 A. It depends. They could be there for
12 a day. They could be there up until their
13 trial, which could be a year. There's no set
14 time frame where they have to leave.

15 Q. But that's a facility for
16 pre-sentencing?

17 A. Pre-sentencing, and then there were
18 some sentenced prisoners from the municipal
19 courts.

20 Q. Do you know whether or not -- would
21 you call them inmates at the --

22 A. Correct. Yeah.

23 Q. Okay. Do you know whether or not
24 inmates at that facility could receive
25 prescription opioid medication?

1 A. They received medication. I don't
2 know what it was.

3 Q. You didn't have any involvement in
4 that?

5 A. No. You just basically supervised
6 them taking their medications; don't do anything
7 with the nurse or anything like that.

8 Q. Do you have any training in
9 medicine?

10 A. No.

11 Q. Do you have any training in
12 pharmacies, pharmaceuticals?

13 A. No, I do not.

14 Q. When you became a deputy sheriff in
15 2001, what were your responsibilities?

16 A. Originally was assigned to our
17 patrol division, which dealt with security of
18 the county buildings. We transported inmates
19 from the jail to medical appointments, other
20 jail facilities, prisons. Basically responded
21 to anything that, you know, we were called on.

22 Q. Did you have any involvement in
23 narcotics-related offenses or suspected offenses
24 as a deputy sheriff?

25 MR. BADALA: Objection to form.

1 A. Before I was assigned to narcotics?

2 Q. Sure.

3 A. I don't remember, but I'm sure I
4 wrote a marijuana ticket or something. I don't
5 remember.

6 Q. Okay. And you said you got assigned
7 to the narcotics division in -- is it the
8 narcotics division? Is that right?

9 A. Yes.

10 Q. In 2005?

11 A. Yes.

12 Q. Did you volunteer for that? Were
13 you volunteered for it? How did that come to
14 be?

15 A. No. With our department, they put a
16 posting out when there's openings, and I applied
17 for the position.

18 Q. Why did you apply?

19 A. To -- to get out of the patrol
20 division I guess, to expand my career.

21 Q. Who -- did you have to go through an
22 interview process?

23 A. At the time, no. You just submitted
24 a request form.

25 Q. When you joined the narcotics

1 division, I guess, first of all, how many -- how
2 big was the narcotics division? How many people
3 were involved in it?

4 A. I don't remember the exact number.

5 Q. Hundreds?

6 MR. BADALA: Objection to form.

7 A. No, there wasn't hundreds.

8 Q. More than a dozen?

9 A. Probably close to a dozen maybe.

10 Q. Okay. Who was your supervisor or to
11 whom did you report?

12 A. I reported -- my immediate
13 supervisor was a sergeant at the time, Miguel
14 Caraballo.

15 Q. And who -- did you have any
16 subordinates?

17 A. No. I was still a deputy sheriff in
18 that division.

19 Q. Do you know how long Sergeant
20 Caraballo had been with the sheriff's
21 department?

22 A. He came on in 1997.

23 Q. Okay. What were your
24 responsibilities as -- were you still a deputy
25 sheriff, just a deputy sheriff in the narcotics

1 division?

2 A. Yes.

3 Q. What were your responsibilities in
4 that role?

5 A. We would act on complaints that came
6 in, drug complaints. We would patrol certain
7 areas we knew narcotics was available, just, you
8 know, street level stuff.

9 Q. What sorts of areas would you
10 patrol?

11 A. Mainly downtown -- or not downtown.
12 The Cleveland areas.

13 Q. And what were you looking for there?

14 A. Narcotic activity, drug dealers on
15 the corner, something like that.

16 Q. What kind of drugs?

17 A. We dealt mainly with marijuana,
18 cocaine.

19 Q. Anything else?

20 A. That was our main --

21 Q. Okay. Did you have -- during this
22 time did you do any -- do you remember doing any
23 work around prescription medications?

24 MR. BADALA: Objection to form.

25 A. No, I don't.

1 Q. Do you know who Sergeant -- is it
2 Cabalero (phonetic) --

3 A. Caraballo.

4 Q. I knew it didn't sound right. Do
5 you know, to whom did Sergeant Caraballo report
6 at that time?

7 A. I think it was Lieutenant Mike
8 Jackson, I believe, was our supervisor.

9 Q. Is Lieutenant Jackson still with the
10 sheriff's department?

11 A. No, he's not.

12 Q. Do you know where he went?

13 A. No, I don't.

14 Q. Did he retire or --

15 A. Resigned.

16 Q. Okay. Do you know when that was?

17 A. No, I don't remember the exact --

18 Q. Or why he resigned?

19 A. He was under an investigation for
20 stealing money.

21 Q. From the sheriff's department?

22 A. Yes.

23 Q. How long were you a deputy sheriff
24 in the narcotic division?

25 A. Approximately two years. I was

1 promoted in March of 2007.

2 Q. Promoted to sergeant?

3 A. Yes.

4 Q. And when you were promoted to
5 sergeant, to whom were you -- were you still in
6 the narcotics division?

7 A. No, I was not.

8 Q. Where did you go to?

9 A. I moved back to the patrol division
10 and oversaw that.

11 Q. Was that by request?

12 A. No. That was told.

13 Q. So congratulations, you have a
14 promotion, and now you get to go back to doing
15 what you did before?

16 A. Yes.

17 Q. All right. To whom did you report?

18 A. At the time it was Lieutenant -- I
19 don't remember her name, Lieutenant Millsap. I
20 don't recall her first name. If you give me a
21 second, I can think of it. Ethel Millsap maybe.

22 Q. Okay. And how long were you a
23 sergeant in the patrol division?

24 A. I don't remember the exact amount of
25 time. I know I moved to what we call our sex

1 offender unit after that.

2 Q. Roughly? Do you remember roughly
3 when that occurred?

4 A. Maybe a year or two.

5 Q. Okay. And what were your
6 responsibilities in the sex offender unit?

7 A. The sheriff's department has
8 registered sex offenders come in on a daily
9 basis. We have a tier system for sex offenders
10 here in Ohio. So I oversaw that division.

11 We also do what we call
12 verifications on sex offenders, where deputies
13 will go out and knock on the offender's door,
14 make sure that's where they're living,
15 investigate if they're not living there.

16 We also had two detectives that were
17 assigned to if a person is not living where
18 they're at or they're not reporting, to file
19 charges against them.

20 And at the time we also had a small
21 team that went out and executed warrants.

22 Q. And how long were you in that
23 division?

24 A. Probably a couple years.

25 Q. Okay. What was the next position?

1 A. Unfortunately, it was -- they
2 abolished the rank of sergeant, so I went back
3 to being a deputy sheriff, probably 2010 maybe
4 or '11.

5 Q. When you say "they abolished the
6 rank of sergeant," who is "they"?

7 A. The sheriff at the time did.

8 Q. Do you know why?

9 A. I -- pretty sure it's because we
10 were unionizing.

11 Q. Okay. Are you in the union now?

12 A. Currently, no, I'm not.

13 Q. Okay. Have you ever been in a
14 union?

15 A. Yes.

16 Q. From -- what was the union?

17 A. The OPBA.

18 Q. Ohio --

19 A. Patrolman's Benevolent Association.

20 Q. Okay. And -- wait. I think I can
21 figure this out. You can't be in that union now
22 because you're a captain?

23 A. Yeah. I'm in a classified position,
24 correct.

25 Q. Okay. So when did you stop being a

1 member of the OPBA?

2 A. When I was promoted to captain.

3 Q. Okay. So you were in it when you
4 were lieutenant?

5 A. Yes, I was.

6 Q. All right. I got a friend who's on
7 the D.C. force and now he's the GC of the union,
8 so I talked about this at a volleyball game. I
9 learned a little bit about it. Probably off
10 topic, though.

11 Let's see. Going back to when you
12 were -- when you went back to the patrol
13 division in, roughly, 2007, when you were
14 promoted to sergeant, did you have any
15 involvement with any narcotics-related activity
16 from that point?

17 A. I don't remember that, sir.

18 Q. Okay. Who was in charge of the
19 narcotics division in 2007?

20 A. Probably still Sergeant Miguel
21 Caraballo.

22 Q. And was he still reporting to
23 Lieutenant Jackson, was it?

24 A. I believe so, yes.

25 Q. Okay. And I guess when is the next

1 time in your career that you had -- that you had
2 involvement with narcotics-related activity that
3 you remember?

4 MR. BADALA: Objection to form.

5 A. I don't remember every case I've
6 been involved with with narcotics. Like I said,
7 it could have been me writing a marijuana
8 ticket. I don't want to, you know, not be
9 truthful about that. So I don't know, but my
10 next step as far as supervising would have been
11 when I was promoted to lieutenant.

12 Q. In 2014?

13 A. Yes.

14 Q. Okay. So tell me about that. What
15 were you assigned to do when you were promoted
16 to lieutenant?

17 A. First I was overseeing the uniform
18 division, which included our patrol division and
19 our courts division, and then, after a couple
20 months, was assigned to oversee the narcotics
21 division.

22 Q. To whom did you report when you were
23 a lieutenant?

24 A. Captain Don Michalosky.

25 Q. Is Captain Michalosky still with the

1 department?

2 A. No, he's not.

3 Q. Where did he go?

4 A. He retired and he works for the
5 Metro Hospital Police Department.

6 Q. Okay. Do you know what he does for
7 them?

8 A. He's a captain there.

9 Q. When you were assigned to the
10 narcotics division, who -- did you take over
11 from someone?

12 A. I took over at the time -- he was
13 now Lieutenant Caraballo.

14 Q. Okay.

15 A. He was promoted before me as
16 lieutenant.

17 Q. So where did he go?

18 A. He took over the uniform patrol.

19 Q. You guys just switched?

20 A. Kind of flip-flopped, yes.

21 Q. By request or --

22 A. No. It was told to us.

23 Q. Okay. Do you know why they swapped
24 it, switched it around?

25 A. It was just to get a feel -- I don't

1 think he was ever in charge of a patrol unit and
2 it was just to get more well rounded, I guess.

3 Q. Which is the bigger unit, the patrol
4 unit or the narcotics unit?

5 A. Manpower-wise, the patrol unit, or
6 they call it the uniform personnel, because you
7 got our courts divisions as well.

8 Q. How many folks are in that unit?

9 A. You'd have to give me a second. I'm
10 trying to add it up in my head.

11 Q. Sure.

12 A. I'll give you an answer here.

13 Q. Take your time.

14 A. Probably between 80 and a hundred
15 uniform deputies.

16 Q. And when you became -- as a
17 lieutenant, when you were assigned to the
18 narcotics division, how many officers were in
19 that division?

20 A. Offhand, I don't know.

21 Q. Are we still in the neighborhood of
22 a dozen or so?

23 MR. BADALA: Objection to form.

24 A. Probably somewhere around that, yes.

25 Q. Okay. What was your -- what were

1 your responsibilities as the -- well, as a
2 lieutenant assigned to the narcotics division,
3 did you have other responsibilities besides
4 narcotics?

5 A. Yes, I did.

6 Q. What were the other ones?

7 A. I oversaw our warrant unit, which is
8 basically what it says, guys go out and look for
9 people that have warrants in the county, and I
10 also oversaw what's our impact unit, which is
11 kind of a vice unit. It's a catchall. They do,
12 you know, anywhere from traffic enforcement to
13 prostitution stings, stuff like that. So those
14 were the other units I was overseeing as well as
15 our evidence.

16 Q. So as a lieutenant, I guess what
17 percentage of your time was spent dealing with
18 narcotics-related issues as opposed to the other
19 issues under your -- that you were in charge of?

20 MR. BADALA: Objection to form.

21 A. They were all pretty busy. You
22 know, I'd probably say it's -- it was probably
23 equal across the board.

24 Q. Did you have a mandate to prioritize
25 one of the jobs over the other or do them all

1 well?

2 MR. BADALA: Objection to form.

3 A. I try not --

4 MR. BADALA: Just give me a second.

5 THE WITNESS: I'm sorry.

6 A. I tried not to neglect any of them,
7 to be honest with you.

8 Q. And -- sorry. You were reporting to
9 Captain Mich --

10 A. Michalosky. Please don't ask me to
11 spell it.

12 Q. I won't.

13 Did that ever change? Did you ever
14 report to someone else when you were lieutenant?

15 A. When he retired, I think I reported
16 to the sheriff, I think, yeah.

17 Q. Was it Sheriff Pinkney?

18 A. Yes.

19 Q. Okay. And then --

20 A. I'm sorry. Sheriff Bova I believe
21 it was at the time.

22 Q. Sheriff who?

23 A. Bova.

24 Q. How do you spell that one?

25 A. B-o-v-a.

1 Q. Okay. And do you remember when
2 Captain Michalosky retired?

3 A. Not the exact year. A couple years.

4 Q. You're currently a captain in the
5 sheriff's department?

6 A. Yes.

7 Q. Are you still overseeing the
8 narcotics division?

9 A. Yes.

10 Q. Was there ever a time from whenever
11 it was in 2014 that you were assigned to the
12 narcotics division up till today where you have
13 not had some sort of responsibility over the
14 narcotics division?

15 A. No. That's -- I've always been
16 overseeing that.

17 Q. Okay. Going back -- let's go back
18 to when you were in the narcotics division in
19 2005 through 2007. What were -- did you enjoy
20 being in the narcotics division?

21 A. Yes, I did.

22 Q. What did you like about it?

23 A. The action, I guess if you call it
24 that, the everyday investigations that we
25 conducted. It was -- it was exciting.

1 Q. And the mission back then was to --
2 what was the mission of the narcotics division
3 in 2005 to '07?

4 A. Curtail -- drug enforcement, that
5 was our goal.

6 Q. And when you were doing that, how
7 did you know -- who, if anyone, told you where
8 to go, what to look for, how to do
9 investigations?

10 MR. BADALA: Object to form.

11 A. Usually when any person enters a new
12 unit, they'll pair you up with someone that's
13 been in that unit before, so kind of a training
14 officer takes you under their wing.

15 Q. Who was your training officer?

16 A. I think I was assigned to Detective
17 Nelson.

18 Q. Is -- you said detective. Is that a
19 different rank?

20 A. No. It's just when you -- if you
21 get into our detective bureau, our narcotics
22 division, you get the cool name of detective, I
23 guess it is.

24 Q. Have you ever had the title of
25 detective?

1 A. You could say that, yes.

2 Q. When?

3 A. In the narcotics division.

4 Q. So in 2005 you were both deputy
5 sheriff and detective?

6 A. It's the same thing. You're always
7 a deputy sheriff. I'm still a deputy sheriff
8 today. Just different titles.

9 Q. And when you became lieutenant, when
10 you were the -- when you were promoted to
11 lieutenant and assigned to the narcotics
12 division, did that make you the head of the
13 narcotics division?

14 A. I was one of the supervisors. I was
15 still reporting to a captain, which reports to a
16 chief, which reports to the sheriff.

17 Q. Okay. But the captain, Captain
18 Michalosky, presumably had other things that he
19 was also responsible for overseeing?

20 A. Yes.

21 Q. Were you the most senior person most
22 focused on narcotics when you were the
23 lieutenant?

24 MR. BADALA: Objection to form.

25 Q. It's a bad question. I'll withdraw

1 it. That was probably incomprehensible.

2 What were your -- what was the
3 mission of the narcotics division in 2014, when
4 you were -- when you were assigned to it as a
5 lieutenant?

6 A. When I got in the division, there
7 was some changes. The focus was more on
8 overdoses and prescription pills. We had
9 started -- before I came into the unit, our
10 detectives responded to overdoses within the
11 county. And then there was also a program set
12 up, it was called our drop box pill pickup
13 program. So I was brought up to speed on those.

14 Q. Did you have any involvement with
15 overdoses and overdose investigations in the
16 2005 to '07 time frame?

17 A. I did not respond to any overdoses,
18 no.

19 Q. Do you know whether others on the
20 narcotics division did?

21 A. I don't remember any of them doing
22 it, no.

23 Q. That was something, though, that the
24 narcotics division was doing when you became the
25 lieutenant in 2014?

1 A. Yes.

2 Q. And so do you know when that had
3 started, "that" being responding to overdoses
4 being part of the responsibilities?

5 A. The exact time, no, I don't know.

6 Q. Is that something that has been
7 going on for several years?

8 MR. BADALA: Objection to form.

9 A. I'm not sure about the drop box
10 program, but I believe they were responding to
11 the overdoses.

12 Q. Overdoses on what?

13 A. Any suspected drug overdose they
14 respond to.

15 Q. And was there a particular drug or
16 type of drugs that you were -- that you were
17 seeing prevalent overdoses from?

18 MR. BADALA: Objection to form.

19 A. It was mainly heroin overdoses.

20 Q. Anything else?

21 A. You know, you really wouldn't know
22 until you either got on scene or you got, you
23 know, the report back from the medical examiner.

24 Q. Okay. How many captains are there
25 in the Cuyahoga County Sheriff's Department?

1 A. There's only two of us.

2 Q. Okay. And to whom do you report
3 today? You told me Deputy Taylor?

4 A. Yes, Chief Deputy George Taylor.

5 Q. Okay. And between Captain
6 Michalosky and Chief Deputy Taylor, are there
7 others that you've reported to in between there?
8 I think you said maybe there was a brief --
9 there was a period of time when you were
10 reporting to Sheriff Bova?

11 A. Are you talking about when I was a
12 lieutenant or --

13 Q. Sure. Let's start with lieutenant.

14 A. Okay. When Captain Michalosky
15 retired, actually, I reported to -- it was Chief
16 Pinkney, who is now the sheriff.

17 Q. Was he the chief deputy at the time?

18 A. He was the chief deputy at the time.
19 Sheriff Bova moved on to another position and
20 Chief Pinkney took over the sheriff's spot. At
21 that time we did not have a chief, so I reported
22 right to the sheriff.

23 Q. So to Sheriff Bova, then for a while
24 to Sheriff Pinkney. And then where did Chief
25 Deputy Taylor come from?

1 MR. BADALA: Objection to form.

2 Q. I mean, presumably his parents. Was
3 he in the sheriff's department?

4 A. No. He was with the county, with
5 our safety department.

6 Q. Okay. And when did he come on
7 board?

8 A. 2016, I believe. It's been a couple
9 years.

10 Q. When you were promoted to captain,
11 then did someone get promoted to lieutenant or
12 to run the --

13 A. Yes.

14 Q. To oversee the narcotics division?

15 A. Yes.

16 Q. Who was that?

17 A. Lieutenant Eugene Sharpe.

18 Q. And how long has Lieutenant -- is he
19 still with the department?

20 A. Yes. Yes, he is.

21 Q. How long has Lieutenant Sharpe been
22 with the sheriff's department?

23 A. His whole career?

24 Q. If you know.

25 A. He's been there longer than I have.

1 I don't know the exact hire date.

2 Q. When you were a lieutenant in the
3 narcotics division, was he a sergeant in that --
4 was he in your division when you were the
5 lieutenant?

6 MR. BADALA: Objection to form.

7 A. He was a sergeant in charge of the
8 warrant unit, yes.

9 Q. And so then he moved up and over --

10 A. I moved and he -- right.

11 Q. Have you personally -- Captain
12 Gerome, have you ever had any responsibility
13 relating to policy setting within the sheriff's
14 department in terms of policies related to drug
15 enforcement or responding to drug incidents?

16 MR. BADALA: Objection to form.

17 A. No, not as far as responding. No.

18 Q. How about in terms of strategy,
19 setting strategies or priorities for
20 investigating drug-related offenses?

21 MR. BADALA: Objection to form.

22 A. We've -- I've had conversations with
23 supervisors in the unit on the best way to -- it
24 was mostly managing schedules of the detectives
25 that would respond to the overdoses.

1 Q. When you say the supervisors in the
2 unit, who are you including?

3 A. Lieutenant Sharpe at the time, and
4 then the immediate supervisor would have been
5 probably Sergeant Monteleone or Sergeant Hirko.

6 Q. Do you have any responsibility --
7 have you ever had any responsibility within the
8 sheriff's department related to the department's
9 budget?

10 A. There is some responsibility there.

11 Q. Describe that for me, please.

12 A. Purchase orders, you know, daily
13 purchase orders that might come through, office
14 supplies, stuff like that, needs a captain to
15 sign off on.

16 Q. Okay. Anything else related to the
17 budget?

18 A. Any big expenditures, usually -- I
19 usually discuss with the chief on equipment or
20 anything like that.

21 Q. Anything else?

22 A. I get the update with our fiscal,
23 head of our fiscal department, as to how we're
24 doing with the budget.

25 Q. Who is that? Who is the head of the

1 fiscal department?

2 A. Donna Kaleal.

3 Q. And how long has -- Ms. Kaleal?

4 A. Yes.

5 Q. Does she have a rank or is she --

6 A. I don't know what her exact title --
7 head of fiscal department I guess is her title.
8 I don't know when she started with the sheriff's
9 department. She's been the head since I can
10 remember when I was a lieutenant.

11 Q. Okay. How do -- I guess could you
12 describe for me your responsibilities since
13 you've been a captain as it relates to the
14 narcotics division?

15 A. Yeah. It's overseeing, making sure
16 the guys have the proper -- the equipment they
17 need, the resources that they need to, you know,
18 operate on a daily basis. I brief -- a
19 lieutenant briefs me on what's going on, and if
20 there's anything, you know, out of the ordinary
21 or if we have search warrants coming up or
22 something like that. So the day-to-day
23 operation, that's delegated down.

24 Q. In terms of the resources, are there
25 any -- do you have -- do you have adequate

1 resources for the narcotics division?

2 A. No.

3 Q. Why do you say that?

4 A. Right now we have six detectives.

5 As I've stated before, back in 2005 we had about
6 12. And we've taken on as a department a lot of
7 other operations. So we have to get our
8 staffing levels up more. And I'd like to put
9 more in our narcotics division.

10 Q. Have you requested adding folks to
11 the narcotics division?

12 A. Yes.

13 Q. How do you do that? Who do you ask?

14 A. Conversations with the chief, always
15 going over our personnel.

16 Q. And why haven't you gotten anybody
17 else yet?

18 A. Basically our staffing level at the
19 moment is down from where we should be.

20 Q. Do you know why that is? Why is
21 that, I guess?

22 A. We have high standards, so when we
23 do get applicants, some of them don't make it.

24 Q. So it's a lack of qualified
25 personnel as opposed to budget constraints?

1 MR. BADALA: Objection to form.

2 A. It's -- it's a little bit of both, I
3 guess.

4 Q. Okay. Well, have you -- do you
5 have -- does the narcotics division have
6 adequate funding to carry out its mission?

7 MR. BADALA: Objection to form.

8 A. I don't know. I don't know.

9 Q. Okay. You don't know one way or the
10 other?

11 A. No.

12 Q. When you were a lieutenant, did
13 the -- a lieutenant overseeing the narcotics
14 division, did you have enough detectives?

15 A. No. I mean, as a supervisor, you
16 always want more to do more.

17 Q. Did you request more detectives when
18 you were a lieutenant?

19 A. I don't remember, but -- I don't
20 know.

21 Q. Okay. How about other than more
22 detectives; are there any resources that the
23 narcotics division is lacking to be effective in
24 accomplishing its mission?

25 MR. BADALA: Objection to form.

1 A. Well, there's always the latest
2 technology that comes out that you'd like to --
3 you know, you'd like to get them, but again,
4 it's geared to budget and money and stuff like
5 that.

6 Q. Could you give me some examples of
7 new technology that you would want but haven't
8 been able to --

9 A. Well, they make some cameras that
10 you can purchase now, pole cameras, stuff like
11 that, pole like on a telephone pole, stuff like
12 that. There's devices they make now that, if
13 you have an informant going to do a drug
14 purchase for you, it could be a little credit
15 card, it could be any small little -- instead of
16 the wiring up technique that was used in the
17 past. I'm just -- you know, just like I said,
18 latest technology. Something is coming out new
19 all the time.

20 Q. How do you -- we were talking about
21 your responsibilities, and you said that it's
22 delegated down in terms of, I'm assuming, the
23 day-to-day investigations. How do you stay
24 abreast of what the folks in the narcotics
25 division are doing?

1 A. The lieutenant briefs me on it
2 almost daily.

3 Q. In what format?

4 A. He comes in my office.

5 Q. Okay. Does he -- does he ever give
6 you pieces of paper that list what they're
7 doing?

8 MR. BADALA: Objection to form.

9 A. No.

10 Q. Ever?

11 A. No.

12 Q. Okay. Any other way in which you're
13 aware of what the folks in the division are
14 doing besides the lieutenant briefing you?

15 A. If there is an operation, say a
16 search warrant, for example, and he's not -- or
17 he is either going on it or he's not available
18 to come to my office or I'm not available at the
19 office, he will send me a quick e-mail or
20 something like that, or, you know, a quick text
21 or something like that.

22 Q. All right. Do you use e-mail in
23 your job?

24 A. Yes.

25 Q. Okay. And how many e-mail addresses

1 do you have?

2 MR. BADALA: Objection to form.

3 A. For the job?

4 Q. Sure. Yes.

5 A. Just the one.

6 Q. Okay. What is that?

7 A. My e-mail address?

8 Q. Yes.

9 A. It's Dgerome@cuyahogacounty.us.

10 Q. And you mentioned texts. So do you
11 use text messages in your job?

12 A. Yes.

13 Q. And is that a sheriff -- is it on
14 your personal phone or sheriff department issued
15 phone or both?

16 A. I have two phones. Yeah, both.

17 Q. Okay. One is personal, one is
18 sheriff's department?

19 A. Yeah. I have -- yeah. I have an
20 issued phone and a personal phone. I use them
21 both for work.

22 Q. Okay. And you do both e-mail and
23 text messages from the phone?

24 A. Yes.

25 Q. Phones?

1 A. Yes.

2 Q. Okay. Do you know whether those --
3 both of those phones were searched in connection
4 with production of documents in this case?

5 MR. BADALA: Objection to form.

6 A. I don't know.

7 Q. Did anybody ever tell you they
8 needed your phone for purposes of looking for
9 documents in this case?

10 A. No.

11 Q. And how about your computer; do you
12 know if anybody ever came and looked -- do you
13 have a computer in your office?

14 A. Yes.

15 Q. And does that contain documents,
16 information you use for work?

17 MR. BADALA: Objection to form.

18 A. Yes.

19 Q. All right. Do you know whether that
20 computer was ever searched for responsive --

21 A. I don't know. Nobody ever came in
22 with me being present there and looked for
23 anything.

24 Q. Did you ever -- were you ever made
25 aware of any obligation to preserve documents

1 related to this -- that could be relevant to
2 this litigation?

3 A. Yes.

4 Q. Okay. When was that?

5 A. I don't remember the exact time.

6 Q. All right. By the way, do you know
7 what the lawsuit that you're here testifying in
8 today is about?

9 A. I have an idea, yes.

10 Q. What's your understanding?

11 A. The county is suing the medical
12 companies for the opioid crisis that we're
13 facing today.

14 Q. What do you mean by "the opioid
15 crisis that we're facing today"? What does that
16 mean to you?

17 A. To me that means, like I said, our
18 department investigates overdoses, which is
19 usually related back to that the deceased were
20 at one time addicted to pills.

21 Q. Why do you say that?

22 A. Based on interviews we've conducted
23 with family members, stuff like that, when we
24 respond to these scenes, that's -- it usually
25 relates back to that.

1 Q. Have you read the complaint?

2 A. No, I have not.

3 Q. You have probably more important
4 things to do.

5 Have you spoken to anyone other than
6 lawyers for the county about this lawsuit?

7 A. Yes.

8 Q. To whom?

9 A. George Taylor, chief.

10 Q. Okay. What did you and Chief Taylor
11 talk about related to the lawsuit?

12 A. Basically what I referred to before,
13 is that I was meeting with the attorneys
14 yesterday and the deposition hearing today.

15 Q. Okay. Anything else that you talked
16 about?

17 A. No.

18 Q. Did he ask you any questions?

19 A. No.

20 Q. Did you ask him any questions?

21 A. No.

22 Q. All right. You referred to -- in
23 your answer to the opioid crisis. What do you
24 understand an opioid to be?

25 A. My definition of it?

1 Q. Sure. Yeah.

2 A. A drug that's addictive and helps
3 relieve pain.

4 Q. What, if any, drugs are you
5 including within the category of opioids?

6 A. I would include heroin, fentanyl,
7 hydrocodone, oxycodone, morphine. And I don't
8 know all the particular names for everything,
9 but --

10 Q. And then -- so that description, if
11 I understood it correctly, that would include
12 both medications that are FDA-approved
13 prescription medications and illegal narcotics;
14 is that right?

15 MR. BADALA: Objection to form.

16 Q. For example, is heroin a -- I'm not
17 aware of heroin that you can get by a
18 prescription.

19 A. Neither am I.

20 Q. Okay. So it's got -- that category
21 of opioids has both prescription medications,
22 and I don't know what you want to --

23 A. Illegal, illicit drug. That's my
24 understanding of it, yes.

25 Q. Okay. Have you ever received any

1 training that's specific to opioids of any --
2 any sort of opioid and any sort of training?

3 MR. BADALA: Objection to form.

4 A. I have had what I referred to
5 before, online training. Some of it dealt with
6 prescription and other drugs. I've also had
7 online training in OARRS. So yeah.

8 Q. When did you do the -- when did you
9 do this online training?

10 A. It's -- I don't remember the exact
11 times. The OARRS training came up this past
12 year.

13 Q. Okay. What is OARRS?

14 A. The Ohio -- Ohio Automated
15 Prescription Reporting System, I think it is.

16 Q. Okay. What does it do or what is --
17 what does OARRS do?

18 A. From what I remember from the
19 training, it's a database that keeps track of
20 people's prescriptions that, on the law
21 enforcement end, you could look up -- if you're
22 investigating an active case, you can look up
23 and get information from it.

24 Q. Is that something you've ever done
25 when investigating a case?

1 A. No, I've never done that.

2 Q. Do you know whether anyone in the
3 sheriff's department has used OARRS before?

4 A. No, I do not know.

5 Q. Do you know whether the department
6 has access to the OARRS database?

7 A. I'm not aware of anyone having
8 access in the sheriff's department.

9 Q. Okay. Why did you get the training
10 on the OARRS database?

11 A. We do have a task force officer
12 assigned to DEA. I don't know if he has access
13 or not, but that is probably the reason why I
14 was looking it up.

15 Q. How long was the -- do you remember,
16 how long was the course?

17 A. It's probably no more than 15
18 minutes, 20 minutes tops.

19 Q. Is it a live lecture or is it --

20 A. No. It's slides with a narrator.

21 Q. Who's the task force officer -- did
22 you say assigned to DEA?

23 A. Yes.

24 Q. Who is that?

25 A. We have two deputies assigned to

1 DEA. One is John Gioitta, and we just recently
2 assigned another detective there, Doug Jopek.

3 Q. What does that mean, that they're
4 assigned to DEA?

5 A. In our department we have requests
6 for outside agencies with assistance, so we like
7 to call them -- they call them task forces, and
8 they request the sheriff's department for a
9 couple bodies to help out, and we've given them
10 two bodies from our department.

11 Q. So are they physically working out
12 of DEA's offices?

13 A. Yes.

14 Q. Do you know what they're doing?

15 A. On a day-to-day basis, I don't know
16 every day what they're doing, but they're kind
17 of assigned the same type of work our narcotics
18 does.

19 One is not street level narcotics,
20 but when you get that -- climb that ladder to
21 drug cartels and stuff, I think they're more
22 heavily involved with that.

23 And then the other one is assigned
24 to -- I think it's prescription investigations.

25 Q. Are drug cartels a problem in

1 Cuyahoga County?

2 MR. BADALA: Objection to form.

3 A. I have not encountered any, so I
4 don't know.

5 Q. Okay. But you have one of your --
6 one of your officers is assigned to a DEA task
7 force dealing with drug cartels?

8 A. Yes.

9 Q. How long has that been the case?
10 When did -- how long have you had someone from
11 the sheriff's department on that DEA task force?

12 A. As long as I can remember. I'm not
13 sure. Before I even got in the unit we've had
14 people assigned over there.

15 Q. Have you ever had any interactions
16 with DEA?

17 A. Yes.

18 Q. Describe that for me, please.

19 A. Talking to their officer in charge
20 or agent in charge. We spoke numerous times
21 about how, you know, they're doing over there
22 and making sure they're doing what's requested
23 of them.

24 Q. Making sure that your people on
25 their task force are doing a good job?

1 A. Yeah, that they're happy with them.
2 Yeah.

3 Q. Anything else that you've -- any
4 other discussions you've had with DEA?

5 A. No. We kind of make -- you know,
6 just normal conversations about helping out each
7 other, you know. Whatever they need, we'll
8 offer them help, our resources, and it goes vice
9 versa.

10 Q. Who's the DEA agent in charge?

11 A. Keith Martin is the one I talk to.

12 Q. How long has he been the DEA agent
13 in charge?

14 A. Since I can remember. A couple
15 years maybe. I don't know.

16 Q. Was he someone you talked to when
17 you were a lieutenant?

18 A. I did, yes.

19 Q. I want to ask you a few questions --
20 a few more questions about how the sheriff's
21 department is organized, and I'm going to see if
22 it helps or hurts to use an org chart.

23 - - - - -

24 (Thereupon, Gerome Deposition

25 Exhibit 1, Cuyahoga County Sheriff's

1 Department Organizational Chart, was
2 marked for purposes of
3 identification.)

4 - - - - -

5 MR. BLOCK: So, for the record --
6 how are we doing the numbers, just like --

7 MR. BADALA: They haven't done
8 witness name. You guys have just been doing 1.
9 But you're free to do whatever you want.

10 Q. Gerome 1, a one-page document
11 entitled "Cuyahoga County Sheriff's Department."
12 There's a date of October 2017 in the bottom
13 right corner, Bates labeled CUYAH 12077.

14 Captain Gerome, have you seen this
15 before?

16 A. Yes.

17 Q. What is this document?

18 A. It's an organization chart for
19 our -- the sheriff's department.

20 Q. Okay. Is this -- is this an
21 accurate description of the organization of the
22 sheriff's department as of today?

23 A. This was October -- I'd have to look
24 it over for a minute here.

25 Q. Sure.

1 A. Okay. I'm sorry. What was the
2 question?

3 Q. Whether this -- does this accurately
4 depict how the sheriff's department is organized
5 today?

6 A. Yes, it is, except a couple of the
7 names I think have gone on to other things.

8 Q. Okay. And focusing now just on
9 everything that falls under your name, so you
10 are still a captain in the sheriff's department?

11 A. Yes.

12 Q. And Lieutenant Caraballo and
13 Lieutenant Sharpe are still reporting to you?

14 A. At the moment Lieutenant Sharpe is
15 on medical leave.

16 Q. He's on medical leave?

17 A. Yes.

18 Q. Is there somebody filling his
19 responsibilities?

20 A. I have delegated some of his areas
21 to Lieutenant Caraballo and Lieutenant Smith,
22 and then I've took over some of the other direct
23 responsibilities.

24 Q. Okay. As it pertains to narcotics
25 or drug-related issues, to whom --

1 A. I'm overseeing that right now.

2 Q. Sort of directly?

3 A. Yes.

4 Q. Okay. Within the responsibilities
5 that ordinarily would fall under Lieutenant
6 Sharpe, what is -- what is encompassed within
7 narcotics -- is it narcotics and K9 or is it
8 narcotics K9, one separate unit?

9 A. It's narcotics and K9. We have a
10 couple of K9 dogs assigned to narcotics.

11 Q. All right. And what's the -- what
12 are the principal responsibilities of the
13 narcotics K9 unit?

14 A. We have one assigned to the post
15 office task force. It's basically drug
16 detection with K9s. The other one is assigned
17 not only with us but with homeland security.

18 Q. I think we've talked about the
19 narcotics division. I'm trying to get a sense
20 of which, if any, of these other units within
21 the sheriff's department also touches on
22 narcotics-related issues. So SWAT, I think I
23 know what SWAT is. It's probably not quite like
24 the show on TV.

25 A. I've never seen the show.

1 Q. I haven't either. They advertise it
2 during football games.

3 Does the SWAT unit have any
4 responsibilities related to drug issues?

5 MR. BADALA: Objection to form.

6 A. I guess they do. If there's a
7 search warrant, they'll conduct the initial, I
8 guess, entering the home, make sure it's secure
9 before our detectives go in.

10 Q. How big is the SWAT unit?

11 A. I think we have 15, 16 members.

12 Q. Then next, under Lieutenant Sharpe,
13 is task forces.

14 A. Yes.

15 Q. What's encompassed within task
16 forces?

17 A. We have, as we mentioned, two
18 officers assigned to DEA. We have a deputy
19 assigned to HIDTA, which is another drug task
20 force. High Intensity Drug Trafficking Area I
21 believe is the correct title of it. We have
22 another detective, a deputy, assigned to NOLETF,
23 which is the Northeast Ohio Law Enforcement Task
24 Force. I mentioned the two K9s. And let me see
25 if -- and we do have a deputy assigned to --

1 with homeland security, and they do some
2 narcotics investigations.

3 Q. Who is -- I'm sorry.

4 A. No.

5 Q. Anything else within task force?

6 A. No. I believe that's it as far as
7 that falls under narcotics task forces.

8 Q. You told us who was the two assigned
9 to DEA. Who's assigned to HIDTA?

10 A. HIDTA.

11 Q. H-I-D-T-A, is that right?

12 A. Yes. Ben Meder.

13 Q. And how long has he been there?

14 A. When I became a lieutenant, he was
15 there, so I don't know how long before then he
16 was assigned. So it's been a couple years.

17 Q. Do you know -- how, if at all, do
18 you know what he's doing over there?

19 A. As of right now, I don't have daily
20 contact with him, so I don't know.

21 Q. Okay. Is there any -- is there any
22 sort of strategic communication between the
23 sheriff's department and that task force in
24 terms of making sure you aren't duplicating
25 efforts or getting in each other's way or

1 anything like that?

2 MR. BADALA: Objection to form.

3 A. There's constant communication with
4 our -- the supervisor sergeant from narcotics
5 and the detectives assigned to each area or each
6 task force. There's also -- HIDTA created a
7 deconfliction database, so if you are looking at
8 a suspect or investigating something, you can
9 look in that database, see if anyone else is
10 looking into the same thing.

11 Q. That's something that you have
12 access to at the sheriff's department, that
13 database?

14 A. If I wanted to, yes, I could have
15 access to it.

16 Q. Or folks within the narcotics
17 division have access to it?

18 A. Yes.

19 Q. Who's assigned to the NOLETF?

20 A. Mark Batone.

21 Q. How long has he been there?

22 A. The same deal. He was there before
23 I even became a lieutenant in the division.

24 Q. Okay. And who's assigned to
25 homeland security?

1 A. Anthony Edelman.

2 Q. And going back to -- is it Deputy
3 Batone?

4 A. Deputy, yes.

5 Q. Okay. How do you know what he's
6 doing with that task force?

7 A. It's the same thing with the deputy
8 from HIDTA. The supervisor, the sergeant of the
9 unit has contact with him and their supervisors
10 over there.

11 Q. Okay. And who's the sergeant in
12 your unit that you're referring to?

13 A. Currently right now, Sergeant Hirko.

14 Q. Okay. Same sergeant, Hirko --
15 Deputy Meder and Deputy Batone would report
16 occasionally to Sergeant Hirko as to what
17 they're doing?

18 A. Yes.

19 Q. All right. How about for Deputy
20 Edelman at homeland security? How, if at all,
21 do you know what he's up to over there?

22 A. Same thing. He reports to Sergeant
23 Hirko as well.

24 Q. Okay. Are there any of the other
25 units underneath -- well, starting with under

1 your block as captain -- that have involvement
2 with narcotics-related issues, besides -- we
3 talked about SWAT, we talked about task force
4 and we talked about narcotics K9.

5 A. Our impact unit, which is a vice
6 unit, does come in contact with drug activity, I
7 guess you could say.

8 Q. Who is in charge of the impact unit?

9 A. Sergeant Kozub is the immediate
10 supervisor.

11 Q. Okay. What's the primary mission of
12 the impact unit?

13 A. They're, I guess you can call it, a
14 catchall for the department. Like I said
15 before, they can do anything from assisting --
16 if you have a festival in your hometown, they'll
17 help with security for that, all the way up to
18 prostitution stings. They've done traffic
19 enforcement. They have assisted other agencies
20 with whatever they need. They're kind of -- if
21 you call the county and want some assistance or
22 resources, we ask those guys -- we task those
23 guys with doing it.

24 Q. Who within the sheriff's department
25 sets the priorities for the impact unit?

1 MR. BADALA: Objection to form.

2 A. I think it's a discussion between
3 the sergeant and it used to be Lieutenant
4 Sharpe.

5 Q. Okay. Any other of these units that
6 have involvement with narcotics-related issues?

7 MR. BADALA: Objection to form.

8 A. Well, the drop box, which is
9 incorrect. It falls under Lieutenant Sharpe,
10 too. But you see that under Lieutenant Smith.
11 They have involvement.

12 Q. Could you briefly describe for us
13 what the drop box unit -- is it a unit or --

14 A. We have -- it falls under the
15 evidence sergeant, but we have guys that are
16 assigned to our evidence that do what we call
17 the pill pickup program, so the drop box program
18 throughout the county. We have what looks like
19 a little mailbox called a drop box for
20 prescription pills, unwanted, people can drop
21 off. They're located at the -- usually the
22 police stations, so they're monitored. And we
23 have deputies assigned to go pick up the pills
24 from these drop boxes on a daily basis.

25 Q. Where do the pills go when they're

1 collected?

2 A. We store them in our evidence room
3 and then we destroy them.

4 Q. What kind of pills get dropped off?

5 A. All types of pills. I don't know.
6 I mean, exactly the type?

7 Q. Yes.

8 A. Mostly prescription bottles.

9 Q. But all kinds of prescriptions --
10 MR. BADALA: Objection to form.

11 Q. -- or what kinds of prescriptions?

12 A. I have not gone through them.

13 Q. When did the drop box program start,
14 if you know?

15 A. I don't know. It was there when I
16 became lieutenant.

17 Q. Okay. Outside of -- are there other
18 units within the sheriff's department that have
19 involvement with narcotics-related issues?

20 MR. BADALA: Objection to form.

21 A. I mean, I think any law enforcement
22 has come across narcotics issues, whether it be
23 somebody having something on them, either
24 entering a courthouse or, you know, a traffic
25 stop, something like that, but the people that

1 specifically investigate it are the ones we
2 covered.

3 Q. Okay. There's also medical director
4 on here. What does the medical director for the
5 sheriff's department do?

6 A. That's the jail medical director.
7 He oversees the medical dispensary stuff inside
8 the jail.

9 Q. Okay. And the director of nursing,
10 that's also for the jail?

11 A. Correct. And Marcus is no longer
12 there.

13 Q. Okay. All right. Great.

14 MR. BLOCK: Why don't we take a
15 break, if that's all right.

16 MR. BADALA: Sure.

17 THE VIDEOGRAPHER: Off the record,
18 10:02.

19 (Recess had.)

20 THE VIDEOGRAPHER: On the record,
21 10:16.

22 BY MR. BLOCK:

23 Q. Captain Gerome, I want to go back to
24 when you were promoted to lieutenant and then
25 assigned -- assignments were switched and you

1 were going to be going back to the narcotics
2 division as one of your responsibilities, so
3 that's 2014 at some point; is that right?

4 A. Yes.

5 Q. Okay. Did you get a -- did you get
6 any sort of briefing from anyone when you
7 were -- now the narcotics division was falling
8 under your supervision, as to what the narcotics
9 division was doing and how it was operating?

10 A. Yes.

11 Q. From whom?

12 A. Lieutenant Caraballo, who I was
13 switching places with.

14 Q. All right. How did that -- did you
15 get anything in writing in terms of what was
16 going on?

17 A. No.

18 Q. Just a face to face. How long did
19 that take?

20 A. I don't -- I think he probably
21 updated me on what was going on and, I mean, we
22 keep in contact. It's not like he was assigned,
23 you know, somewhere I couldn't get a hold of
24 him, but the meeting, I don't remember how long
25 that lasted.

1 Q. Does the sheriff's department have
2 any manuals of any sort that relate to how to
3 conduct a narcotic-related investigation?

4 A. No, not that I'm aware of.

5 Q. If I replace the word "manual" with
6 document, any piece of paper whatsoever that
7 relates to how to conduct a narcotics-related
8 investigation?

9 MR. BADALA: Objection to form.

10 A. Okay. I'm -- I'm not sure I
11 understand that.

12 Q. Sure.

13 Are there any documents at all
14 within the sheriff's department that deal with
15 how to conduct a narcotics-related
16 investigation?

17 MR. BADALA: Objection to form.

18 A. Not that I'm aware of, no.

19 Q. Do you know how many employees there
20 are within the sheriff's department?

21 A. No, I don't.

22 Q. Okay. We were talking about the
23 number of folks in the narcotics division and
24 you also testified a little earlier about your
25 thoughts that there should be more detectives

1 assigned to the narcotics division.

2 Do you remember that?

3 A. Yes.

4 Q. When you were talking about the
5 number of people within the narcotics division,
6 were you including within that count folks like
7 Detective Batone, who's assigned somewhere else?

8 A. No. I was specifically talking
9 about the detectives assigned in our division,
10 not task force officers, correct.

11 Q. I'm sorry?

12 A. Not the task force officers.

13 Q. You would count them separately?

14 A. I do.

15 Q. Okay. Does your department -- with
16 respect to narcotics-related investigations,
17 does the sheriff's department interact at all
18 with the Cleveland Police Department?

19 A. Yes.

20 Q. How so?

21 A. Again, deconflicting is what we call
22 it, and I guess if they need resources, we
23 provide them with the resources. If we need
24 something, they'll help us out.

25 Q. Deconflicting, how do you do that?

1 A. I mentioned the database that was
2 set up by HIDTA. Also, you know, detectives can
3 call each other.

4 Q. Do you have -- is there a
5 counterpart of yours at the Cleveland Police
6 Department in terms of having oversight for
7 narcotics-related investigations?

8 A. Counterpart, yeah. I have -- I talk
9 to Commander Gary Gingell, who oversees a lot of
10 their units as well.

11 Q. What do you and Commander Gingell --

12 A. It's pronounced -- everyone says it
13 different. It's G-i-n-g-e-l-l. So Gingell.
14 I've heard him be called jingles before.

15 Q. To his face?

16 A. Well, I haven't, but -- no.

17 Q. What do you and he talk about?

18 A. He's also in charge of SWAT over
19 there, so we go over resources for SWAT, and
20 then we also discuss, you know, how they're
21 handling their overdoses and stuff as well.

22 Q. Is that all -- do you guys ever
23 trade e-mails on these subjects?

24 A. I've -- he's part of an e-mail chain
25 with the medical examiner, so I've seen some of

1 his responses.

2 Q. Outside of that, do you guys e-mail
3 ever directly, one on one, you to Commander G?

4 A. We might have, probably just either
5 helping them out with an event or SWAT or
6 something like that. Yeah, I'm sure there's
7 e-mails in there with me and him.

8 Q. Are there any other local law
9 enforcement agencies that you, at the sheriff's
10 department, interact with as it relates to
11 narcotics investigations?

12 A. Me personally or our -- our
13 narcotics unit?

14 Q. Both.

15 A. Okay.

16 Q. Or either, I guess.

17 A. I've had a phone call or e-mail
18 conversations with some chiefs about our
19 overdose responses. Our detectives that respond
20 to the overdoses, they have a rapport with
21 agencies because they're responding to their
22 jurisdictions in conducting an investigation for
23 them or assisting with it, too.

24 Q. What chiefs do you recall having
25 conversations with, communications with?

1 A. Geez. The recent one I can remember
2 is Chief -- don't ask me how to spell this
3 either -- Scharschmidt from Parma Heights. We
4 talked about the investigations in his city.

5 There -- I can't remember the name.
6 There was a Parma -- I believe it was a captain
7 for Parma Police Department. We discussed their
8 role and our role in the investigations.

9 I think those are the most -- the
10 ones I can remember.

11 Q. What was being investigated in Parma
12 Heights?

13 A. We -- he -- I think he just became
14 chief. I think he was a captain. He had called
15 and asked, you know, how it all works as far as
16 us coming out and conducting an investigation if
17 there was a suspected drug overdose. I just
18 explained to him the procedure that we use as
19 far as calling out and detectives arriving on
20 scene and what they should do as a local
21 department to secure the scene.

22 And then I think we had one there,
23 and we did respond, but he -- he advised me at a
24 later time, I think on the phone, that they're
25 going to handle their investigations themselves,

1 just keep it within their jurisdiction. And I
2 think that was the last conversation I had with
3 him.

4 Q. Meaning that he didn't want the
5 sheriff's department coming to any future
6 overdose scenes in the City of Parma Heights?

7 A. He said his detectives were going to
8 handle the scenes.

9 Q. Okay. Well, let's talk about --
10 let's talk about those -- this would be "the
11 scene" being the scene of an overdose?

12 A. Yes.

13 Q. Do you remember specifically, this
14 one in Parma Heights, what the person had
15 overdosed on?

16 A. No, I do not.

17 Q. Okay. I guess, does it -- is it the
18 same general procedure that's followed
19 regardless of the type of overdose? You don't
20 know when you get the call what someone has
21 overdosed on, I assume, generally, usually?

22 A. The only -- there might be some
23 limited information in the alerts that are sent
24 out, but no. The detectives won't know until
25 they actually get there and survey the scene and

1 see what's going on.

2 Q. So let's walk through that process.

3 First of all, how does the sheriff's
4 department know -- how are you made aware that
5 there's an overdose or a potential overdose that
6 needs investigating?

7 A. So within Cuyahoga County, we
8 respond to certain municipalities, townships,
9 not all of them. Some like to do their own. So
10 if there is a suspected drug overdose, the local
11 police department will notify the medical
12 examiner. If it's -- a medical examiner will
13 put out an alert to -- there's a list of people
14 on the e-mail chain -- advising them that we
15 have a possible drug overdose. They'll give the
16 location, usually the age, gender of the person
17 involved, and then maybe a brief thing if there
18 is suspected drugs on scene or anything like
19 that.

20 Our detectives are all on that alert
21 as well as the supervisors. So in certain
22 jurisdictions, we are responsible for going and
23 helping out. We have detectives that are on
24 call for that, and they are assigned, you know,
25 vehicles to respond to that scene.

1 The locals are -- we kind of treat
2 it as a homicide scene now. So they secure the
3 scene like a normal homicide, with the tape and
4 everything like that, and our detectives will
5 show up and take over from there.

6 Q. Let me ask you a few follow-ups on
7 that.

8 First of all, how long has this been
9 something that the sheriff's department has been
10 responding to?

11 A. It was before I came -- became a
12 lieutenant, so I don't know the exact date it
13 started, but --

14 Q. And are we talking responding only
15 if there's been a -- I'm sorry. Is an
16 overdose -- is this always a fatality that
17 you're describing?

18 A. Lately, yes. Those are the ones we
19 respond to, yes. They're deceased.

20 Q. Okay. Are there ever times where
21 you respond to an overdose where the person is
22 not -- ends up not dying from the overdose?

23 A. Yeah. It has happened in the past.
24 We call it non-fatal. And with that, it's
25 usually the agency will probably request our

1 assistance. If it's a smaller agency that
2 doesn't have the resources, they'll reach out to
3 us for assistance. But yes, it has happened.

4 Q. And then you said a detective from
5 the narcotics division, I suppose, goes to the
6 scene?

7 A. We assign two detectives to go.

8 Q. Two. Okay. Why two?

9 A. There's multiple things to be done.
10 Sometimes even the supervisor will show up if
11 needed. There are certain responsibilities they
12 have at the scene.

13 Q. And what are the detectives supposed
14 to do at the scene? What's their mission
15 basically?

16 A. Collect evidence, photograph the
17 scene, interview any witnesses, gain whatever
18 intelligence they can from whatever neighbors,
19 family members, friends, whoever they -- you
20 know, whatever information they can get on the
21 scene, and they'll start their investigation
22 from there.

23 Q. What are they investigating?

24 A. Our main objective is to find out
25 who was -- sold the drugs to this individual and

1 try to go after them.

2 Q. Is there -- is there a standard --
3 is there some sort of -- is there a checklist
4 that the detectives have for when they're on
5 scene, here are the -- here's what we need to
6 look for or the questions we need to ask?

7 MR. BADALA: Objection to form.

8 A. I'm not aware of a document or a
9 checklist that -- they may have one of their
10 own. I don't think there's an official one that
11 was put out, but I think, like I said, they may
12 have something on their own they go off of.

13 Q. Is there any reporting obligation
14 that the detectives who respond on the scene
15 have? Do they have to write a report of what
16 they observed?

17 A. Yes, absolutely. Yes.

18 Q. Okay. Is that report -- is that on
19 a form or they can write it on a cocktail napkin
20 if they want?

21 A. No. We have a report management
22 system now, so everything is documented on that.

23 Q. What's the name of the management
24 system?

25 A. TAC, T-A-C.

1 Q. What's that stand for?

2 A. I don't know.

3 Q. That's an electronic system?

4 A. Yeah. It's a system that's used by
5 most agencies here in Cuyahoga County and
6 Northeast Ohio.

7 Q. When you say "most agencies," who
8 are you including?

9 A. Police departments. I don't have
10 the exact names of them, but I think within
11 Cuyahoga County the majority of them use this
12 system.

13 Q. How long has TAC been -- how long
14 has it been the TAC system that this information
15 has been put into?

16 A. For our department?

17 Q. Yes.

18 A. We introduced it this past year, I
19 think January -- I'd say December, January is
20 when we went live with it.

21 Q. How were the reports collected prior
22 to TAC?

23 A. There's another database. It's
24 called Crime. And that's linked to the
25 prosecutors. And, again, a lot of agencies have

1 that as well. And the Crime links up with our
2 TAC system, so it linked up with other people's
3 TAC system. But that was our main database for
4 report writing and stuff like that.

5 Q. Okay. Any other databases prior to
6 Crime that you remember in terms of where the
7 narcotics folks would report what they found on
8 the scene?

9 A. I think most detectives kept their
10 own file folders, stuff like that.

11 Q. Have you ever been a detective
12 responding to an overdose scene?

13 A. No, I have not.

14 Q. Have you ever submitted a report
15 related to an overdose scene?

16 A. No, I have not.

17 Q. Okay. That's -- those are the
18 detectives in the field, so to speak, I guess
19 that are doing it?

20 A. Yeah. Our detectives that are on
21 call, or if it happened now, one of our guys on
22 duty would respond to it.

23 Q. What are the detectives trained
24 to -- what are they trained to look for at the
25 crime scene? I'm sorry. At the scene. It's

1 considered a crime scene, I take it?

2 A. Yeah. We consider it a homicide
3 scene based on what we found in the past about
4 overdoses and people selling these drugs.

5 And I'm sorry. The question?

6 Q. What are they trained to look for?

7 A. Any sorts of evidence. It could be
8 anywhere from a plastic baggie. A crucial piece
9 now is a cell phone. We try to get those. If
10 there's drug paraphernalia. Anything that could
11 be considered, you know, evidence these days.

12 Q. In terms of, I guess, part of what
13 they're supposed to do is interview witnesses or
14 potential witnesses; is that right?

15 A. Yes. If there's -- obviously
16 somebody found the person. If it wasn't law
17 enforcement doing a welfare check, they'll try
18 to interview those people. If there's family
19 members present or someone has knowledge of the
20 person, stuff like that, try to interview them.

21 Q. What are they asking the people that
22 they're interviewing?

23 A. Just about, you know, their past.
24 If they seen anything out of the ordinary, if
25 they have a drug history, if this happened

1 before. Just trying to get to know who the
2 decedent is and, you know, try to get a little
3 background on that.

4 Q. And that information, whatever
5 information they glean from those interviews, is
6 included as part of the report that gets
7 submitted into the Crime or, now, TAC database;
8 is that right?

9 A. I'd have to review specific reports.
10 I think it's more of a feel who they're dealing
11 with, where to go with the investigations. I
12 don't know if they exactly include the history
13 of that person because you're going off of
14 witness statements. You know, you don't have
15 anything official until the medical examiner
16 comes out with what happened.

17 Q. Is there any requirement that, let's
18 say -- a lot of these scenes the response ends
19 up being a heroin overdose; is that right?

20 A. I'm sorry. Could you repeat that?

21 Q. Heroin overdose scenes, is that --

22 A. Yes, we've investigated those. Yes.
23 Correct.

24 Q. So is there any requirement for a
25 detective who goes to a heroin overdose scene --

1 are they required to ask -- try to ascertain
2 from whoever they interview whether that -- the
3 person who overdosed on the heroin has ever in
4 their life before taken a prescription opioid?

5 A. That's something they can ask, yeah.
6 I'm not sure I'm following your question.

7 Q. My question is, are they required
8 to?

9 A. Are they required to?

10 Q. Yes.

11 A. No.

12 Q. Are they trained to ask that
13 question?

14 A. I think any detective investigating,
15 it's something you kind of want to know.
16 Specific training, you know, our detectives have
17 gone to interview interrogation school, stuff
18 like that. So I don't know if that was brought
19 up or not.

20 Q. You don't know one way or the other?

21 A. No, I don't.

22 Q. All right. I guess what happens --
23 what happens next? So the officer goes --
24 sorry. The detectives --

25 A. Yes.

1 Q. Do they file two separate reports?
2 You said that there are two detectives that go
3 to the scene.

4 A. No. It will be a lead detective who
5 will do the actual reporting writing, and the
6 other one might submit a supplement report on
7 what they did.

8 Q. Okay. What happens next in terms of
9 the investigation?

10 A. Are you talking about the scene
11 itself or from --

12 Q. Sure. Let's start with the scene
13 itself.

14 A. Securing the scene, photographs.
15 You know, I might have left this out. The
16 medical examiner comes and collects the body.
17 So, you know, anything like evidence on the
18 body. In Ohio here, the medical examiner is the
19 only one that has the right to search the body
20 unless they're in your presence. So after the
21 scene is secure, interviews are done, and
22 they'll leave.

23 Q. Okay. What happens next?

24 A. It depends on what was collected and
25 what information you obtained. A lot of it --

1 information, with the cell phone technology, we
2 can get a search warrant for cell phones and try
3 to see who the person has been contacting. We
4 try to get information from whoever, if there's
5 someone to interview on scene, if they know
6 anybody, names, hanging out with, associates,
7 stuff like that. Just trying to obtain
8 information to try to get the person that caused
9 this.

10 Q. What happens next in terms of the
11 investigation?

12 A. Some investigations, like I said, it
13 could turn into you finding out who the person
14 was, the drug dealer. Some investigations, you
15 might not have anything to go on, and those
16 will, you know, sit until -- for information,
17 only until you can get some more information.
18 Obviously you wait for the medical examiner's
19 report to come back to tell you exactly what it
20 was.

21 Q. Do you know how many -- how many
22 arrests has the sheriff's department made based
23 out of investigations from overdose scenes, if
24 you know?

25 A. No, not offhand I don't know.

1 Q. Have there been arrests made as a
2 result of investigations into overdose scenes?

3 A. We -- as a matter of fact, last
4 week -- it made the papers -- they arrested a
5 guy that was selling fentanyl and heroin.

6 Q. Where? Here in Cuyahoga County?

7 A. Yes.

8 Q. That was someone -- who arrested
9 him, someone in the sheriff's department?

10 A. Yeah. My detectives arrested him.

11 Q. Okay. And this was a guy who was
12 selling -- where was he getting the heroin?

13 A. I don't know where he got the heroin
14 from.

15 Q. Okay. And the fentanyl that he was
16 getting, was that like illicit fentanyl as
17 opposed to it wasn't prescription?

18 MR. BADALA: Objection to form.

19 Q. Was it prescription fentanyl that he
20 was selling?

21 A. We don't know where he got the
22 fentanyl.

23 Q. Do you know what form the fentanyl
24 was in? Was it a pill, patch?

25 A. It was powder.

1 Q. Powder. All right.

2 And how did it -- how were the
3 people in your department able to find this guy
4 and arrest him?

5 A. I'm not familiar with the exact
6 circumstances that led them to the search
7 warrant. I was briefed on that. It was from an
8 overdose scene that they investigated, and an
9 important piece of evidence they were looking
10 for was his phone -- they did get the phone --
11 and trying to link that to the deceased
12 overdose.

13 Q. The person that was arrested was --
14 is it a he?

15 A. He, yes.

16 Q. Was he a doctor?

17 A. No. I'm sorry. Not that I'm aware
18 of.

19 Q. Okay. Did he work at a pharmacy?

20 A. I don't know where he worked.

21 Q. Or a distributor?

22 A. Again, I don't know his background.

23 Q. Okay. Do you know where he was
24 arrested?

25 A. Yes.

1 Q. Where?

2 A. It was an apartment in Rocky River.

3 Q. Does the sheriff's department keep
4 track of the number of arrests that are made for
5 drug offenses, I guess? Would this be an arrest
6 for a drug offense, this guy who was arrested?

7 A. Yes.

8 Q. Okay. Do you keep track of the
9 number of folks that the sheriff's department
10 arrests for those kind of offenses?

11 A. Statistics for drug arrests in the
12 unit?

13 Q. Yes.

14 A. Yes, there are statistics.

15 Q. Who keeps those?

16 A. It's probably usually the
17 supervisor, immediate supervisor of the unit.

18 Q. So that would be?

19 A. The sergeant.

20 Q. Oh, the sergeant, okay. Remind me
21 who the sergeant is.

22 A. Right now it's Sergeant Hirko.

23 Q. Hirko. All right.

24 Have I asked you -- have you ever
25 served on any task force related to narcotics?

1 A. No.

2 Q. And if I say "narcotics," in your
3 mind would that include like -- you testified
4 earlier that prescription drugs are something
5 you're looking into. Would you include those
6 within narcotics? I didn't mean to be excluding
7 them.

8 A. Yes.

9 Q. Okay. Have you -- has the sheriff's
10 department ever responded to an overdose where
11 the person overdosed on prescription narcotics?

12 A. I'm not aware of every toxicology
13 report that we've responded to, so I don't know.

14 Q. Are you aware of any arrests the
15 sheriff's department has made that stemmed out
16 of an investigation of someone who overdosed on
17 prescription narcotics?

18 MR. BADALA: Objection to form.

19 A. No, I'm not aware. I don't know.

20 Q. Okay. Do you know whether the
21 sheriff's department has ever investigated any
22 physicians relating to prescription narcotics?

23 A. Since I've been in the unit, I was
24 never briefed on those, investigating
25 physicians.

1 Q. Same question, investigated any
2 pharmacies?

3 A. Same answer. Not that I'm aware of
4 since I've been in charge.

5 Q. And same question, investigated any
6 distributors?

7 A. Again, not that I'm aware of since I
8 took over.

9 Q. And investigated any manufacturers
10 of prescription medications?

11 A. Not that I'm aware of since I've
12 been in charge of the unit.

13 Q. Let's see. The alert that triggers
14 the scene investigation, that comes from the
15 county medical examiner; is that right?

16 A. Yes.

17 Q. Is that Mr. Shannon?

18 A. He works for the medical examiner.
19 I'm not sure if he's the actual one sending the
20 alert. I don't know who actually the person
21 typing in the alert is, but it comes from their
22 office.

23 Q. All right. So is that the only way
24 the alert gets to the sheriff's department is
25 through the e-mail?

1 A. It's e-mail, and you can set it up
2 so you receive a text as well.

3 Q. Okay. So I guess you guys have to
4 be checking your phones and e-mails frequently?

5 A. Well, you hear it. I mean, you hear
6 it go off.

7 Q. Does it have a special alarm
8 associated with it as opposed -- you know, like
9 sometimes you get an Amber alert and your phone
10 goes nuts.

11 A. It probably depends how you set up
12 your phone. Mine is just a regular text like
13 any other text that comes through.

14 Q. All right. And is there a protocol
15 within the sheriff's department for making sure
16 that -- it sounds like a lot of people are
17 getting the e-mail. How do you know -- how does
18 it get decided, okay, you two men or women are
19 the ones tasked with responding to the scene?

20 A. So in our department we have it set
21 up where the detectives that are on duty during
22 the day will respond to it. We also have two
23 detectives that are -- works a different shift.
24 They're an afternoon shift until the nighttime.
25 And then we have detectives, the same ones or it

1 can vary, depending on, you know, vacation and
2 stuff, that are on call to respond to that, and
3 that's -- it's a 24/7 operation for us.

4 Q. I can't remember -- sorry -- if I
5 finished asking you the question I intended to.
6 I jumped around. Have you ever served on any
7 task force -- task forces relating to narcotics?

8 A. No, I have not.

9 Q. Have we -- we talked about some of
10 the sheriffs -- the deputy sheriffs who are
11 assigned to other task forces. I want to make
12 sure we've exhausted that list. Are you
13 familiar with something called -- let me strike
14 everything I just said and ask a different
15 question.

16 Are you familiar with something
17 called the Cuyahoga County Opiate Task Force?

18 A. Yes.

19 Q. What is that?

20 A. Well, the sheriff's department is
21 part of that. I've been to some meetings on
22 behalf of the sheriff. And that's just
23 department heads within Cuyahoga County coming
24 together, meeting. I want to say it's like once
25 or -- a month or once every couple months, and

1 just discussing the resources and what's being
2 done or what can be done to put an end to the
3 opiate epidemic, I guess.

4 Q. How long has that task force been in
5 place?

6 A. Since about -- when I was promoted
7 as lieutenant it was in place.

8 Q. Okay. Do you know how much further
9 before that?

10 A. No, I don't.

11 Q. When is the first -- are these
12 in-person meetings? Does the task force have
13 in-person meetings?

14 A. Yes.

15 Q. Where do they do those?

16 A. The ones I attended, which was a
17 couple, at the Federal Building.

18 Q. Okay. Is there -- does someone
19 chair the meeting? Is there a head of that task
20 force?

21 A. The one I -- yeah. There's --
22 there's the U.S. Attorney's Office. Her name is
23 Carole Rendon. The ones I was at, she was
24 involved. She chaired it.

25 Q. Did you actively participate in --

1 have you actively participated in any of these
2 meetings, where you got up and -- I don't know
3 if you stand up, but you said here are my
4 thoughts or here's something I have to report?

5 A. I don't remember standing up giving
6 a briefing on anything. Usually introductions
7 are made in case there's somebody there that
8 hasn't been there before. They give you a brief
9 briefing on what, you know, the events they're
10 about to talk about and the events that were
11 talked about at the last meeting. Like I said,
12 Gary Gingell from Cleveland Police is there, and
13 there's some other -- a couple judges attend it.

14 Q. Is there anybody from DEA?

15 A. Yes. Keith Martin has attended it
16 before. So it's -- there's a little agenda.
17 And then there's civilians, you know, with
18 certain programs that attend it as well. So
19 it's just -- it's a roundabout table talking
20 about -- we can bring up anything you want,
21 whatever to try to end this.

22 Q. Can you remember any discussions
23 at -- from these opiate task force meetings
24 where prescription opioids have been the
25 subject?

1 A. I don't remember specifics from the
2 meeting, but it's talked about.

3 Q. What do you remember being talked
4 about, if anything, relating to prescription
5 medications?

6 A. Probably treatment for individuals,
7 I think, was discussed.

8 Q. What do you mean by that?

9 A. The judges usually brought up
10 treatment for individuals that come in their
11 courtroom that are charged with either
12 prescriptions or heroin or stuff that's related
13 to overdoses.

14 Q. And when you say "treatment," what
15 do you mean?

16 A. Rehab. You know, their drug
17 addiction treatment.

18 Q. Got it.

19 Anything else -- any other
20 discussions that you can remember from these
21 opiate task force meetings relating to
22 prescription medications?

23 A. I haven't attended one in a while,
24 so not that I remember.

25 Q. Is there someone from the sheriff's

1 department who -- who is the principal person
2 who normally goes to the opiate -- the opiate
3 task force meetings?

4 A. The sheriff is usually invited, and
5 like I said, I would represent him. The chief
6 has gone to a couple, I believe.

7 Q. Have you ever been asked by the
8 chief for a briefing -- the chief said, "I'm
9 going to this task force meeting, anything I
10 should be aware of," like getting input from you
11 before he goes to the meeting?

12 A. No, he's never asked me that.

13 Q. Same question for the sherriff. Has
14 he ever asked you for input?

15 A. No.

16 Q. Do you know whether the sheriff's
17 department provides any information to the task
18 force?

19 A. I have never provided information.
20 I don't know if they have when they've attended.

21 Q. Do you get -- you said you get an
22 agenda. For the times you participated, there
23 was an agenda?

24 A. Yes.

25 Q. Was that something you got in

1 advance?

2 A. Yes.

3 Q. And are there minutes? Do you get
4 minutes of the meetings afterward?

5 A. I don't think there is minutes.
6 It's a pretty generic agenda of what was talked
7 about at, I think, the last meeting, what they
8 want to talk about at this meeting.

9 Q. And how about within -- shifting
10 gears a little bit, staying on the topics of
11 minutes, and we can look at them in a little
12 bit, but I've seen some minutes of sheriff's
13 department meetings. Have you ever seen minutes
14 of meetings just within your sheriff's
15 department about -- I'll finish the question
16 there.

17 A. No. Go ahead.

18 Q. That was the question. Have you
19 ever seen minutes?

20 A. Yes, I have.

21 Q. All right. Who -- do you know who
22 prepares those?

23 A. The sheriff's secretary, when we
24 have a staff meeting, takes care of those.

25 Q. Okay. How often do you have staff

1 meetings?

2 A. Once a month.

3 Within the sheriff's department?

4 Q. Yes.

5 A. Yeah, once a month.

6 Q. Okay. And how long -- who -- to
7 what rank -- what ranks attend the staff
8 meetings?

9 A. On the law enforcement end, there's
10 actually two staff meetings. One is a law
11 enforcement staff meeting and then there's an
12 all staff meeting. The all staff meeting is the
13 one we're referring to where they take the
14 minutes. In law enforcement it's lieutenants
15 and above attend it.

16 Q. Are there minutes kept of the law
17 enforcement meetings?

18 A. No.

19 Q. Are there agendas submitted ahead of
20 time?

21 A. No.

22 Q. Are there any pieces of paper
23 whatsoever related to the law enforcement staff
24 meetings?

25 A. No.

1 Q. All right. And you said that the
2 all staff meetings are once a month?

3 A. Yes.

4 Q. Is it a set -- it's always the
5 second Tuesday of every --

6 A. It's -- yeah, it is -- I don't
7 remember what day it is. I think it's usually
8 on a Wednesday, so I think it's the first
9 Wednesday of every month.

10 Q. All right. And is there an agenda
11 sent around ahead of time?

12 A. No.

13 Q. Are you expected to -- how do you
14 know what, if anything, you're supposed to cover
15 at the staff meeting?

16 MR. BADALA: Objection to form.

17 A. I guess it's up to the supervisor to
18 just give updates on what's going on.

19 Q. So let's -- the all staff meetings,
20 can you recall any all staff meeting at the
21 sheriff's department where prescription
22 medications were discussed?

23 MR. BADALA: Objection to form.

24 A. I don't remember.

25 Q. And how about law enforcement staff

1 meetings; can you remember any law enforcement
2 staff meeting where prescription medications
3 were discussed?

4 A. No, I don't remember.

5 Q. Okay. And have you gone to -- you
6 said the law enforcement staff meetings were
7 lieutenant and above. So have you regularly
8 participated in those since you were promoted to
9 lieutenant?

10 A. Yes.

11 Q. All right. On the drop box program,
12 does that -- I guess who, if anybody -- do they
13 inventory what is turned in in the drop boxes?

14 A. Inventory it?

15 Q. Yes.

16 A. As far as marking what pills or --
17 no. They weigh it. That's about all they do.

18 Q. And how is it -- how is that
19 material destroyed?

20 A. There's several ways we get -- do
21 it. We used to take it to Charter Steel, which
22 is a steel mill, and they used to burn it for
23 us. They no longer do that. We have a company
24 called Ross Disposal we've taken it to. They're
25 located, I think, at the Elyria/Lorain area.

1 I'm not sure if you're familiar with the area.

2 Q. Yes.

3 A. They'll dispose it. And then now
4 currently, the DEA -- we're turning it over to
5 the DEA. I think it's set up for like two or
6 three times a year we're going to turn
7 everything over to them and let them destroy it.

8 Q. Do you have any involvement with the
9 High Intensity Drug Trafficking Area Task Force?

10 A. Me personally?

11 Q. Yes.

12 A. We have a detective assigned to it,
13 so I guess if I oversee the narcotics division,
14 that it flows up the chain, yeah.

15 Q. What do you understand the mission
16 or the purpose of that task force to be?

17 A. They mainly deal with interdictions.
18 It could be hotel interdictions. And I think
19 that's their -- you know, that's what they do.

20 Q. What do you mean by interdiction?

21 A. Hotel or motel interdictions. If we
22 get complaints from either hotel management or
23 citizens, wherever, of any drug activity going
24 on inside the hotel or motel, they'll set up on
25 it and investigate it.

1 Q. Okay. Is there a lead agency within
2 that task force, to your understanding?

3 A. I believe Cleveland Police
4 Department leads that.

5 Q. Okay. Do you know what -- is there
6 a principal drug or type of drugs that that task
7 force is focused on?

8 A. No. All drugs. I don't know that
9 they specify one or not.

10 Q. Marijuana?

11 A. It could be.

12 Q. Cocaine?

13 A. Could be, yes.

14 Q. Would that include prescription
15 medications?

16 A. It would be whatever they came
17 across. Just like any other law enforcement,
18 something illegal, they act on it.

19 Q. All right. Have you ever personally
20 arrested anybody for any offense related to
21 prescription medications?

22 A. Not that I remember, no.

23 Q. Have you ever arrested anybody
24 related to -- for an offense related to
25 marijuana?

1 A. Yes.

2 Q. Cocaine?

3 A. Yes.

4 Q. Heroin?

5 A. Yes.

6 Q. Fentanyl?

7 A. No.

8 Q. The cocaine, marijuana, heroin
9 arrest, was that when you were -- when did you
10 make those arrests?

11 MR. BADALA: Objection to form.

12 A. During my time in narcotics, but as
13 far as marijuana, that's kind of throughout your
14 career, and probably cocaine and stuff like
15 that. It's throughout your career as law
16 enforcement. I can't give you specific dates or
17 times, but it's occurred over time.

18 Q. Okay. Are you familiar with
19 something called STANCE, Standing Together
20 Against Neighborhood Crime Everyday?

21 A. Yes.

22 Q. Do you have any -- what is that?

23 A. Again, it's the department heads get
24 together. I've -- have not attended one of
25 those so I don't know what's discussed in those.

1 Q. Okay. Are you -- do you have any --
2 does the sheriff's department participate in
3 STANCE?

4 A. Yes. I believe the chief or sheriff
5 attend those, or the other captain. I have not.

6 Q. Do you know whether STANCE has
7 anything to do with narcotics?

8 MR. BADALA: Objection to form.

9 A. I have not attended a meeting, so I
10 don't know.

11 Q. All right. To your understanding,
12 it's either the sheriff or the deputy who would
13 represent the sheriff's department at STANCE
14 meetings?

15 A. From what I understand, it's the
16 sheriff, Chief Deputy Taylor, or the other
17 captain, Captain Peters, would have attended one
18 of those. I have not.

19 Q. Okay. Do you -- have you ever
20 served on the Cuyahoga County Drug Board Court
21 Advisory Board?

22 A. Have I served on it?

23 Q. Yes.

24 A. No.

25 Q. Would it surprise you if you were

1 listed on their listing of the advisory board?

2 Let me -- I'll back up.

3 Do you know what the drug court,
4 county drug court does?

5 A. Yeah. The term you used kind of
6 confused me. What did you call it? I'm sorry.

7 Q. I called it the county drug court
8 advisory board.

9 A. Okay. It's just referred to as drug
10 court. That's why it kind of confused me.

11 Q. Fair enough. I'm really not trying
12 to trick you.

13 Do you have any involvement with the
14 drug court?

15 A. Right now, no.

16 Q. Have you ever?

17 A. Yes.

18 Q. Describe for me your involvement
19 with the drug court.

20 A. I can't remember what year. It was
21 after I was a lieutenant in charge of the
22 uniform courts division. The judges requested a
23 couple of our deputy sheriff's that work in the
24 courtrooms to specifically work their
25 courtrooms, which they were in charge of, you

1 know, drug court obviously.

2 Q. Yes.

3 A. We gave them -- we gave them two
4 deputies we felt would do the best job for them
5 and assigned them to that.

6 Q. What were the judges looking for?

7 A. Someone that would talk to the
8 offenders, maybe go check on them. Kind of --
9 whatever kind of the judge requested that they
10 wanted -- that they would do.

11 Q. Okay. And so are there currently
12 deputies from the sheriff's department who are
13 what, assigned to the drug court or is part of
14 their responsibilities?

15 A. Since I'm not in charge of courts
16 anymore, I don't know if they still have
17 deputies assigned to that or not.

18 Q. When you were assigned to courts, is
19 that court security -- I'm looking at the org
20 chart, Exhibit 1. Which group would that be?

21 A. I'm just making sure it's not called
22 something else here.

23 Q. Sure.

24 A. Yeah, it would be court security.

25 Q. Okay. When you were in charge of

1 court security, the people you identified as the
2 ones who would be good for that role, were they
3 affiliated with the narcotics division?

4 A. No.

5 Q. Is there any -- any coordination at
6 all between the court security and the narcotics
7 division? I mean, did the court security people
8 learn anything in that role that could be
9 helpful to the narcotics division in its
10 operations?

11 MR. BADALA: Objection to form.

12 A. I'm not aware they had
13 communications with each other. I don't know.

14 Q. Okay. So how long were you involved
15 with the drug court?

16 A. When I was promoted to captain, so
17 it was a couple of years.

18 Q. Okay. Did you ever go to meetings
19 related to the drug court, whether they were
20 officially called an advisory board or something
21 else?

22 A. No, I did not.

23 Q. All right. Have you heard of
24 something called the Heroin and Opioid Action
25 Plan Committee?

1 A. No.

2 Q. We'll come back to that.

3 Do you know, the folks -- so does
4 the sheriff's department get any funding that's
5 related to having members of the sheriff's
6 department that are assigned to task forces?

7 A. I'm sure the overtime that the task
8 force officers can accrue are paid for by those
9 agencies up to a certain limit. I don't know if
10 that answers the question or not.

11 Q. That helps, yes.

12 A. As far as grants for them to be on
13 these task forces, I'm not aware -- the
14 sheriff's department, we pay their salaries,
15 their regular salaries.

16 Q. Does the sheriff's department have
17 any other expenditures other than the salaries
18 of the people participating in the task force
19 relating to the operations of the task force?

20 MR. BADALA: Objection to form.

21 A. We're still responsible for
22 equipment, their gun, ammunition, vest, any type
23 of equipment that the normal officer would need.
24 We're still responsible for all that.

25 Q. Okay. Anything else?

1 A. Not that I can think of.

2 Q. Okay. Do you know whether the
3 sheriff's department ever gets any funds that
4 relate in some way to money or property that any
5 of these task forces are able to seize or obtain
6 by forfeiture as a result of their
7 investigations?

8 MR. BADALA: Objection to form.

9 A. Yes. We do receive part of any
10 seizures.

11 Q. Okay. Do you know how much in any
12 particular year?

13 A. No.

14 Q. Who would know the answer to that?

15 A. Our fiscal head, Donna.

16 Q. Donna. That's Donna Kaleal?

17 A. Yes.

18 Q. Okay. Does the -- are you aware of
19 any grants of any sort that the sheriff's
20 department, the Cuyahoga County Sheriff's
21 Department, have received that relate at all to
22 narcotics?

23 MR. BADALA: Objection to form.

24 A. No. I'm -- not firsthand knowledge,
25 no.

1 Q. Okay. Secondhand knowledge?

2 A. I would imagine something -- there
3 might be a grant for the medical staff in the
4 jail. I don't know.

5 Q. And how about grants related to the
6 investigation of drug offenses? Does the
7 sheriff's department receive any state funding
8 for that?

9 A. Not that I'm aware of.

10 Q. Okay. And how about federal
11 funding?

12 A. Not that I'm aware of.

13 Q. Okay. Does the sheriff's department
14 itself seize -- ever seize money or other
15 property in connection with drug-related
16 investigations?

17 MR. BADALA: Objection to form.

18 A. Yes.

19 Q. And does that -- the proceeds of any
20 of those forfeitures, do those go back into the
21 sheriff's department budget then?

22 MR. BADALA: Objection to form.

23 A. Yes.

24 Q. Okay. Do you know what the
25 magnitude is of those -- the value of those

1 seizures or forfeitures?

2 A. I don't understand that question.

3 Q. I'm trying to figure out how much
4 money the sheriff's department makes, for lack
5 of a better term, as a result of its operations
6 which lead to forfeitures and seizure of money
7 and other things.

8 A. I get briefed on what's in the
9 accounts that we have. Anytime there's a
10 deposit, a forfeiture deposit into our -- the
11 law enforcement trust fund is what it's called,
12 the sergeant in charge of our evidence and
13 forfeitures will include me in an e-mail
14 stating, you know, how much was put in there.

15 Q. All right. Do you know what the
16 approximate balance of that fund is?

17 A. No. I have not been briefed lately
18 on it.

19 Q. Who is the sergeant that's in charge
20 of that?

21 A. Sergeant Devlin is in charge of our
22 evidence/forfeiture.

23 Q. What's that fund used for?

24 A. Training, equipment is the main two.
25 Sometimes out-of-town training. It pays for

1 flights, stuff like that.

2 Q. Okay. Do you know where -- where
3 does the sheriff's department -- where does the
4 money to fund the sheriff's department's
5 operations come from?

6 A. The complete -- the whole sheriff's
7 department?

8 Q. Sure.

9 A. Okay. We're budgeted through the
10 county for that.

11 Q. Okay. And then within the
12 sheriff's -- is there a budget within a budget
13 for the sheriff's department specific to
14 narcotics?

15 MR. BADALA: Objection to form.

16 A. No.

17 Q. Or to the narcotics division?

18 A. No.

19 Q. How, if at all -- are there any
20 sub-groups within the sheriff's department that
21 have budget allocations that roll up into the,
22 you know, budget for the entire department?

23 MR. BADALA: Objection to form.

24 A. As you see on the org chart, there's
25 several divisions.

1 Q. Yes.

2 A. I don't know if there's a budget
3 allocated for each division. That would be a
4 question for fiscal, so --

5 Q. Does the law enforcement division
6 have a budget within the sheriff's department
7 overall budget?

8 A. I'm not aware how -- how she keeps
9 track of each division.

10 Q. Do you have to ever submit any
11 financial information to Ms. Kaleal?

12 A. No.

13 MR. BADALA: Good time to take a
14 five-minute break?

15 MR. BLOCK: Yes. Sure.

16 THE VIDEOGRAPHER: Off the record,
17 11:07.

18 (Recess had.)

19 THE VIDEOGRAPHER: On the record,
20 11:22.

21 BY MR. BLOCK:

22 Q. Captain Gerome, you had mentioned,
23 when you were talking about the narcotics
24 division responding to overdose scenes, that
25 there are some jurisdictions where, I guess, the

1 sheriff's department is invited, and there are
2 others which have said they want to handle it on
3 their own. So what are -- take it either way,
4 but I'm just trying to figure out what that
5 dividing line is. What jurisdictions are
6 sheriff's department folks responding to
7 overdose scenes in now? Or if it's easier --

8 A. It's probably easier to go the other
9 way with it because there's, I think, 58
10 municipalities, townships. I have a hard time
11 naming all 50 something of them that we do
12 respond to.

13 The main ones that we don't respond
14 to is the Cleveland -- the City of Cleveland.
15 They handle their own investigations. Another
16 couple large ones is the Lakewood Police
17 Department, the Parma Police Department, Parma
18 Heights now, that I think I mentioned before.
19 Westlake Police Department handles their own.
20 And then there's a few smaller suburbs on the
21 east side who have kind of banded together, come
22 up with their own little mini task force. I
23 don't know the acronym that they call
24 themselves, but it's like the Mayfield, Mayfield
25 Heights, Gates Mills community out there, which

1 they've come together and they'll investigate
2 their own.

3 I'm sure I'm missing one or two, but
4 those are the ones that stand out right now.

5 Q. Thank you.

6 And has that -- you mentioned Parma
7 Heights is a relatively new addition to that
8 list. The others, has that been the case since
9 you were a lieutenant?

10 A. When I took over the division,
11 those -- they were still handling theirs.

12 Q. Okay. We talked about one thing the
13 detectives do on the scene is they interview
14 folks. I assume that's -- that they can only
15 interview people if there are people there on
16 the scene. What, if anything -- what, if any,
17 interviews are done in a situation in which
18 there's no one to interview at the scene? Do
19 they go back and try to find folks to talk to?
20 Do they do follow-up interviews after the
21 on-the-scene investigation, if that makes sense?

22 A. Yeah. I mean, identifying the
23 bodies is important, first of all. With the
24 help of the medical examiner, we'll do that. I
25 mean, every scene is different. If the case is

1 where there's nobody and maybe it was a welfare
2 check or something like that, where the police
3 found them, you know, interviewing neighbors,
4 trying to get -- you know, see if they can get a
5 hold of family members. We always try to get a
6 hold of family members to do a notification as
7 well. So, you know, follow-up would be
8 interviewing them and seeing what they know or
9 they don't know. But in those cases, those are
10 the tough ones to solve if there aren't people
11 that we could talk to.

12 Q. If there's an interview done, you
13 know, a day, a week after the scene, how does
14 that get -- how does that information get into
15 the file for that case? Is there a supplemental
16 report that's submitted into Crime or, now, TAC?

17 A. There could be a supplement report
18 depending on what information is given. If it's
19 someone giving, you know, sort of acting as an
20 informant or something like that, you know,
21 we'll withhold some of the names, stuff like
22 that.

23 Q. Sure.

24 A. But yeah, that will be in a
25 supplement report if it helps in the

1 investigation.

2 Q. Is each investigation assigned a
3 different -- some sort of unique case number or
4 otherwise within your systems?

5 A. No. Our TAC system is just one
6 after another case number.

7 Q. I guess I'll show you how much I
8 don't know about police investigative work. But
9 if you respond to an overdose on -- if the
10 detectives respond to an overdose on Elm Street,
11 you know, in August, does that get a case -- you
12 know, that's case number 12 is the Elm Street
13 August overdose or -- so that if things happen
14 later, that they can trace back to it, all the
15 information gets collected associated with a
16 particular case, or does it just go into the
17 system chronologically?

18 MR. BADALA: Objection to form.

19 A. The case numbers are generated
20 chronologically, but if you do punch in an
21 address, a certain address, it will pop up
22 whatever -- whoever else might have entered
23 information on that location.

24 Q. Okay. I see.

25 We talked about the Crime database

1 and the TAC database. Are there any other
2 databases in which information related to the
3 sheriff's department, narcotics investigations,
4 is input?

5 A. I don't know if you consider it a
6 database. We have spreadsheets where we keep
7 our -- track of our drop box program and our
8 heroin -- our drug overdose investigations.

9 Q. What is in -- related to the drug
10 overdose investigations, what sort of
11 information is on this spreadsheet?

12 A. It will give the address, the
13 decedent's name, case number, date it was
14 assigned. It will have the detectives' names
15 that were assigned to it. And there is a
16 comment section on -- either you can put input,
17 evidence taken, or if the report -- if the
18 medical examiner's report was given back. It's
19 just maybe something that might have stood out
20 you can put in under the comments field.

21 Q. Who maintains that spreadsheet
22 within the department?

23 A. Right now, the -- each detective is
24 responsible for adding that information if
25 they're the lead detective responding to the

1 scene.

2 Q. As I understood your testimony, it's
3 one common spreadsheet that everyone in the
4 department has access to and each person puts a
5 row in if they're doing a case, or did I get
6 that wrong?

7 A. The spreadsheet is not accessible by
8 everybody in the department. It's for
9 supervisors and the narcotics division.

10 And I'm sorry. What was the second
11 part of your question?

12 Q. I was trying to figure out who
13 maintains it.

14 A. The detectives -- like I said, the
15 detectives that are lead investigators will
16 update, and it's the supervisor, the sergeant's
17 responsibility, to make sure that that
18 information is being inputted.

19 Q. Okay. Who is -- is it on a shared
20 drive, somebody's computer? If I wanted to go
21 today and get a copy of it, where would I go?

22 A. It's on a shared drive.

23 Q. Okay. And do you know whether that
24 shared drive was searched in connection with
25 providing responsive documents for this

1 litigation?

2 A. I do not know.

3 Q. Do you know what the file name is or
4 what it's called, this spreadsheet?

5 A. I believe it's "Heroin Overdoses."

6 Q. You mentioned it's heroin overdoses.
7 So is that -- is it a subset of the overdoses
8 that you're investigating or does any overdose
9 go onto the heroin overdose spreadsheet?

10 A. Every overdose that we respond to.
11 That's just the name it was given.

12 Q. And is that because the majority of
13 the overdoses turn out to be heroin or --

14 A. I didn't come up with the name. I
15 couldn't answer that.

16 Q. Did that spreadsheet exist when you,
17 as a lieutenant, went over to the narcotics
18 division?

19 A. They had some form. I believe they
20 had some form of documentation they were keeping
21 on -- I preferred it to be on a spreadsheet so
22 it's more accessible to the supervisors and
23 myself.

24 Q. And what's the purpose of having it
25 in the spreadsheet? What, if anything, do you

1 do with the spreadsheet?

2 A. Statistics. It's how we keep track.

3 Q. Keep track of?

4 A. The overdose we've -- our department
5 responds to.

6 Q. Okay. And who -- who, if at all, do
7 you report that info to?

8 A. I view it. There's always requests
9 for it.

10 Q. Okay.

11 A. So, you know -- I don't know. I'd
12 have to go through all -- if it's public record,
13 because there's active investigations, but I
14 just -- it's just something I thought it's a
15 good idea to start keeping track of when I was
16 assigned there.

17 Q. How many overdose -- how many
18 overdoses were on that spreadsheet, do you know,
19 for like -- for the last year, for 2017?

20 A. 2017, I believe we had over 70,
21 around that figure; 73 I think it was, something
22 like that.

23 Q. And the overdoses on this
24 spreadsheet, would those only be overdoses to
25 which members of the county sheriff's department

1 responded to the scene? In other words, it
2 wouldn't include overdoses in Parma Heights, if
3 they weren't asking you to --

4 A. No. It's strictly our department.

5 Q. Okay. How about calendar year 2018?
6 Do you know how many there have been thus far?

7 A. I think we're up to a little over
8 50; 51, 52.

9 Q. How about for 2016, if -- did you
10 have the spreadsheet in 2016?

11 A. Yes. It's -- yes.

12 Q. Do you remember how many?

13 A. I'm sorry. I don't.

14 Q. Do you know if it was more or less
15 than 2017?

16 A. No, I don't know.

17 Q. Is there a column in -- is there a
18 field somewhere in the spreadsheet that
19 identifies the drug or drugs on which the person
20 overdosed?

21 A. I think there's a toxicology report,
22 yes or no, if you got it back yet, but again,
23 that's something with our record management
24 system. We -- our new system that we keep track
25 of, that information gets inputted into there.

1 Q. What system -- was that TAC?

2 A. Yeah. Yeah. And, I mean, the
3 medical examiner's, you know, toxicology report
4 would come back.

5 Q. Are there any other -- so we talked
6 about TAC and Crime and then this spreadsheet.
7 Are there any other databases in which
8 information related to these overdose
9 investigations is stored?

10 A. Not that I'm aware of. I don't know
11 if detectives have their own folders they keep
12 track of.

13 Q. Have you heard of something called a
14 Law Enforcement -- LEADS, Law Enforcement
15 Automated Data System?

16 A. Yes.

17 Q. Is that something that the sheriff's
18 department has?

19 A. Yes.

20 Q. What kind of information is in
21 LEADS?

22 A. LEADS is a database where you can
23 look up information basically on anyone that has
24 an Ohio identification, a driver's license, ID
25 card. I think almost all law enforcement

1 divisions in Ohio have it. Like I said, you can
2 look up -- if you make a traffic stop, that's
3 something that some of our deputies are
4 certified in and they can do it manually on the
5 mobile data terminal or they can call it into
6 our dispatch and they'll run it for you.

7 Q. And what will -- what kind of info
8 will LEADS then give you about the individual
9 that you're running the inquiry on?

10 A. Basically, the first thing that
11 comes up is their driving information. The
12 stuff that's on your driver's license appears,
13 including a picture. Your driving status,
14 whether you have a valid license or not. I do
15 believe -- and I haven't been on it in a
16 while -- that your traffic information, past
17 traffic information for a certain amount of
18 years, will pop up. If you have a warrant or
19 not. Outstanding warrants will pop up.
20 Nowadays carry and conceal license will pop up
21 on it. And that's all I can remember.

22 Q. Anything -- can you get -- does
23 LEADS -- are you able to query LEADS to get any
24 sort of drug-related, crime-specific information
25 about --

1 A. Yeah. You would have to -- a
2 request -- what's called a CCH, criminal
3 history, and then you would get that person's
4 history.

5 Q. Okay. And I think you said you, at
6 the sheriff's department -- the sheriff's
7 department has access to LEADS?

8 A. Some deputies are LEADS certified
9 and they can get that access on their own with a
10 LEADS terminal, but if not, our dispatchers in
11 our radio room are all certified in LEADS and
12 they can get that information for you and get
13 that to you.

14 Q. Okay. How about something called a
15 Law Enforcement Records Management System or
16 LERMS; does the sheriff's department have such a
17 thing?

18 A. No, we do not.

19 Q. Okay. Do you know what -- are you
20 familiar with LERMS?

21 A. I believe that's the Cleveland
22 Police database that they use. Just like we use
23 our TAC, they use that.

24 Q. Do you know whether the -- can the
25 Cleveland Police -- is there anyone at the

1 Cleveland Police Department that can look and
2 see what you guys have going on in TAC, you
3 know, log in or have access to?

4 A. No, they can't.

5 Q. All right. And can you, at the
6 sheriff's department, log in to LERMS and
7 compare notes on what the Cleveland Police are
8 doing?

9 A. No, not unless each agency creates
10 an account for that person.

11 Q. Are you aware, does anyone at the
12 sheriff's department have access to the
13 Cleveland --

14 A. I'm not aware of anyone, no.

15 Q. Are you familiar with something
16 called the ARCOS database?

17 A. Can you spell that?

18 Q. I think it stands for Automation of
19 Reports and Consolidated Order System.

20 A. I'm not familiar with that.

21 Q. All right. Then I think you've
22 answered my next question, but do you know
23 whether anyone at the sheriff's department has
24 access to the ARCOS database?

25 MR. BADALA: Objection to form.

1 A. I don't know.

2 Q. All right. You spoke -- you
3 testified earlier about the OARRS database, the
4 Ohio Automated RX Reporting System?

5 A. Yes, sir.

6 Q. And -- I can't remember if you told
7 me -- does anyone within the sheriff's
8 department have access to OARRS data?

9 MR. BADALA: Objection to form.

10 A. I'm not aware of anyone having that.

11 Q. Okay. Have you ever requested that
12 the sheriff's department get access to the OARRS
13 database?

14 A. I have not requested it, no.

15 Q. All right. Do you know whether any
16 OARRS data has ever been shared with the
17 sheriff's department?

18 MR. BADALA: Objection to form.

19 A. I'm not aware if it has or not.

20 Q. Do you have a view as to whether
21 information that's -- that OARRS tracks could be
22 helpful to the sheriff's department in terms of
23 narcotics investigations?

24 MR. BADALA: Objection to form.

25 A. In my view -- at our department, any

1 type of tips or investigation that deals with
2 prescriptions, we usually turn that over to our
3 task force officer at the DEA.

4 Q. What do you mean by that? Give me
5 an example of a tip that relates to
6 prescriptions.

7 MR. BADALA: Objection to form.

8 A. I'm not aware of any tips that we
9 have received from prescriptions. I'm not aware
10 of every tip that comes in.

11 Q. I'm not trying to have you blab
12 secrets about pending investigations or
13 anything. You testified, though, that if you
14 got info related to prescriptions, you would
15 turn it over to the task force member at the
16 DEA?

17 A. Correct.

18 Q. And I was just trying to figure out,
19 are you talking about like if there was -- if
20 there was a report that -- I don't know -- a
21 doctor was writing scripts for medications that
22 he really wasn't intending to have a medical
23 purpose, that's something you would turn over to
24 DEA?

25 A. Yes.

1 Q. Okay. Has that -- has that been
2 your practice since you've been involved with
3 the narcotics division?

4 A. I just think it's something that
5 specifically they investigate and that's why
6 he's over there.

7 Q. Okay.

8 A. I don't have -- I'm not aware of the
9 tips or anyone -- or us passing on those cases
10 to them.

11 Q. Okay. But if you got such a tip,
12 that's where you would direct it?

13 A. Yeah. The sergeant would probably
14 follow up with that, give that to the officer.

15 Q. Okay. Have you -- have you heard
16 of -- did I ask you about LEADS? I did ask you
17 about LEADS.

18 How about the Ohio Law Enforcement
19 Gateway, or OHLEG, O-H-L-E-G?

20 A. Yes.

21 Q. Are you familiar with that?

22 A. Yes, sir.

23 Q. What kind of information is in
24 OHLEG?

25 A. A little bit of the same information

1 from LEADS. It's a database where you look
2 up -- you can put someone's -- whatever
3 identifier they have, name, date of birth,
4 Social Security Number. And the same thing will
5 populate. It will give information, driver's
6 license, driving status. It would also give you
7 a background on his driving history. There's
8 also other information on that, including the
9 training that I referred to earlier with the
10 online training. We call it EOPATA. And then
11 there's other stuff it puts out for information
12 for officers on it.

13 Q. Does the sheriff's department have
14 access to the OHLEG gateway?

15 A. Yes.

16 Q. Is that something that folks within
17 the narcotics division ever use or access in
18 connection with their responsibilities?

19 A. Yes.

20 Q. How about the Ohio Incident-Based
21 Reporting System? Are you familiar with that,
22 OIBRS?

23 A. Yes, I'm familiar with it.

24 Q. What is that?

25 A. Now that we have our TAC RMS system,

1 it's kind of a stat keeping for the state. If
2 you have a certain type of investigation,
3 there's little check blocks. That information
4 will go to the state and they'll have that
5 statistics. I think it keeps track of
6 statistics each law enforcement department is
7 working on. An example could be how many
8 domestic violence cases are there in Ohio, stuff
9 like that.

10 Q. Does your TAC system feed into the
11 OIBRS?

12 A. Yes.

13 MR. BADALA: Objection to form.

14 Q. And do you ever -- do folks at the
15 sheriff's department ever use OIBRS in
16 connection with their work in investigating
17 drug-related -- doing drug-related
18 investigations?

19 A. I don't know. I don't know.

20 Q. How about something called either
21 CRIS or C-R-I-S, the Cuyahoga Regional
22 Information System? Are you familiar with this?

23 A. Yes, I am.

24 Q. What is that?

25 A. That has kind of gone away. I

1 really can't speak that much on it. That's --
2 I'm not familiar with it as far as it's still in
3 use. I don't even know if it's still in use. I
4 think it was a gateway between LEADS and
5 Cuyahoga County, but I'm not that familiar with
6 it.

7 Q. When did it go away?

8 A. The past couple years.

9 Q. So when do you remember --

10 A. I should rephrase that. I don't
11 know if it's went away or not, but you don't
12 hear about it, and I don't know anyone in our
13 department that uses it or it's still in use.

14 Q. Did anyone at the sheriff's
15 department ever use it?

16 A. I'm not familiar with what it did so
17 I don't -- I couldn't answer that.

18 Q. Okay. We have a lot of databases,
19 but let me ask you, the Regional Enterprise Data
20 Sharing System or REDSS, are you familiar with
21 that?

22 A. That kind of took over for CRIS.

23 Q. Okay.

24 A. And that's where it's kind of
25 confusing. I don't know where they're at, that

1 stage, over there.

2 Q. Is that something that the sheriff's
3 department has access to, the REDSS database?

4 A. I'm not aware. I'm sure we do, but
5 I'm not aware of anyone that does.

6 Q. All right. TipSoft, have you heard
7 of TipSoft?

8 A. I believe that's our Crime Stoppers
9 database. I don't know if that's still in
10 existence or not. I'd have to check up on that.

11 Q. Okay. Do you know, does the
12 sheriff's department ever get tips about
13 narcotics-related activity?

14 A. Yes.

15 Q. And how does that happen? How do
16 you get -- how do you get LEADS or tips?

17 A. There's a new format with Crime
18 Stopper. Well, for the department, it could be
19 a variety of ways we get tips versus our Crime
20 Stoppers program. And that's electronically
21 sent to the supervisor of whatever area that
22 it -- the tip deals with. We get tips through
23 our website, our e-mail. There could be phone
24 calls, anonymous calls, or people give their
25 names, called in. So all sorts of new ways to

1 get tips. And then we also -- we just came out
2 with a sheriff's app where you can submit a tip
3 as well.

4 Q. Is there anyone within the sheriff's
5 department that's responsible for collecting and
6 keeping a record of all the tips that are coming
7 in, like do you have a -- is there someone who
8 keeps a log of everything that's been --

9 A. Statistically, no. I think the only
10 one that does is the Crime Stoppers division.
11 The other tips that come in, I don't -- there's
12 no stats kept on them. They're just sent to the
13 individual department that deals with it.

14 Q. Who -- which person or department
15 functions as the switchboard operator to figure
16 out, okay, I got this tip, I need to make sure
17 that someone in narcotics knows about it versus
18 someone in warrants or -- who does that?

19 A. We -- we have a detective, Jamie
20 Bonnette, that does that. He gets the tips
21 through e-mail and he'll send them to the
22 appropriate supervisor.

23 Q. Okay. Is that his principal -- he
24 or she?

25 A. He.

1 Q. Is that his principal job?

2 A. No.

3 Q. Okay. I mean, do you get -- do you
4 know if you get lots of tips a day or it's
5 like --

6 MR. BADALA: Objection to form.

7 A. I don't know.

8 Q. Okay. Are you familiar with the
9 Ohio Local Law Enforcement Information Sharing
10 Network?

11 A. You read it. I'm looking. I'm
12 trying to think of the acronym.

13 Q. OLLEISN, something like that.

14 A. I've heard of it, yes. I'm not
15 familiar with it.

16 Q. Okay. Is that something you've ever
17 used?

18 A. I don't know.

19 Q. Do you know whether the sheriff's
20 department uses it?

21 A. I don't know.

22 Q. How about the -- we talked about the
23 HIDTA before.

24 A. Yes.

25 Q. Are you familiar with a Case

1 Explorer Opiate Database that HIDTA has?

2 A. Yes.

3 Q. All right. What is that?

4 A. I mentioned before, it's kind of a
5 deconfliction database, and that's for
6 investigative purposes. Our detectives will use
7 it as a tool to try to deconflict and see if
8 someone else has a suspect, same area, or same
9 street, or something like that. You can enter
10 any information you want into that. You can
11 enter the victim's name. You can enter the
12 suspect's name. You can enter an address into
13 it. And it's just information sharing with the
14 law enforcement agencies.

15 Q. Can you just explain a little bit
16 more about what would happen next if someone at
17 the sheriff's office, I guess, puts a victim's
18 name in and it gets a hit in the HIDTA database?
19 What happens? What do you do?

20 A. It's probably not so much of a
21 victim's name, but if you have a suspect you
22 believe is involved in one of these fatal
23 overdoses --

24 Q. Yes.

25 A. -- and another detective from

1 another agency or something has that same
2 suspect, again, it's information sharing, try
3 to, you know, locate that back to the suspect
4 that sold that fatal dose.

5 Q. So what is supposed -- what, if
6 anything, is the deputy in the sheriff's
7 office -- sorry. Let me back up. Can you, from
8 the sheriff's office, query the HIDTA --

9 A. HIDTA, yes.

10 Q. -- HIDTA database?

11 A. We have detectives that have access
12 to it, yes.

13 Q. And are your folks supposed to
14 access -- double-check the HIDTA database every
15 time they're focusing in on a suspect from one
16 of these overdose investigations?

17 MR. BADALA: Objection to form.

18 A. It's a tool for all law enforcement.
19 We advise them to put that information in and
20 try to gain -- you know, if you're working an
21 investigation, and see what else -- if someone
22 else is working the same thing. Like I said,
23 it's information sharing.

24 Q. So in a circumstance in which
25 someone looks to see if there's something in

1 HIDTA about a suspect and there is, what is
2 supposed to happen next, if anything, in terms
3 of sharing the information or coordinating the
4 efforts?

5 MR. BADALA: Objection to form.

6 A. Well, if you have the same suspect,
7 you're going to contact them and see what kind
8 of information they have on this person.

9 Q. Okay.

10 A. They may have been investigating an
11 overdose that happened in their jurisdiction,
12 basically deconflicting, and then also I believe
13 it shows maps of where overdoses have been
14 occurring just for crime stat purposes and
15 deconflicting and information sharing.

16 Q. Does the sheriff's department put
17 any information into HIDTA? In other words, are
18 you -- I understand that you can look to see
19 whether that task force is doing work
20 investigating someone. Can that task force look
21 and see if you're doing work -- how would they
22 know if your deputies are investigating the same
23 person?

24 MR. BADALA: Objection to form.

25 A. I have never used the database.

1 I've been to -- I don't want to say a training,
2 but when it first rolled it, what they said it
3 can and can't do. My understanding is if you
4 query an address or a person's name or something
5 like that, if that person or address has been
6 entered into the database, that will show up and
7 then you can go take it from there.

8 Q. And I'm trying to figure out whether
9 the people in the -- your people who are doing
10 investigations, are they supposed to be kind of
11 putting any information into HIDTA so that
12 others would know that they're working on the
13 case?

14 A. Yeah. When this first rolled out,
15 the detectives were instructed to use this
16 database on every -- not just overdoses, but
17 heroin or pills, any type of investigation that
18 dealt -- that might link back to the overdose
19 epidemic. Any type of that information should
20 be put into that system, because it was created
21 just for the information sharing amongst
22 departments. When we started off, each agency
23 was kind of doing their own thing, and then the
24 department heads got together and said, hey, can
25 we -- could you guys create a database where we

1 could share information and hopefully put a dent
2 into this.

3 Q. Do you know whether your TAC system
4 feeds into or can be accessed by the HIDTA?

5 A. No.

6 Q. Don't know or it can't be?

7 A. I don't think it can be, no.

8 Q. Okay. Who's the subject matter
9 expert at the sheriff's department about the
10 HIDTA database?

11 A. Expert? I don't -- I don't know if
12 we have an expert.

13 Q. Do you have somebody who's the
14 lead -- you said you got somebody who was
15 trained up on the database?

16 A. Each detective in our narcotics
17 division as well as task forces went through a
18 training with it.

19 Q. Okay. Let's talk a little bit about
20 some of the -- hopefully, the successes that you
21 all have had at the sheriff's department in your
22 efforts in this area, narcotics.

23 I guess the first question, though,
24 is, during your law enforcement career has there
25 ever been a time when drug abuse was not a

1 problem facing Cuyahoga County?

2 MR. BADALA: Objection to form.

3 Q. Drug abuse of any sort.

4 MR. BADALA: Same objection.

5 A. I don't know. I don't know how to
6 answer that.

7 Q. Okay.

8 A. I don't know.

9 Q. Well, what -- do you consider drug
10 abuse to be a problem for Cuyahoga County?

11 MR. BADALA: Objection to form.

12 A. I don't know.

13 Q. What -- since you've been -- well,
14 when you were a detective in the narcotics
15 division, what -- are there any investigations,
16 arrests, results that you're particularly proud
17 of that either you personally or the division
18 was able to attain?

19 MR. BADALA: Objection to form.

20 A. I don't know if proud is the term.
21 I guess some satisfaction in arresting somebody
22 and -- you know, for conducting illegal activity
23 is kind of rewarding. That's why we get into
24 the field. But it's -- I think most officers,
25 it's their job. You know, that's why they

1 signed up.

2 Q. Well, I guess --

3 A. Not for the glory.

4 Q. Probably not for the pay.

5 A. Right.

6 Q. But back -- back to that. Are there
7 particular, then, arrests that you were involved
8 with when you were a detective that were
9 particularly satisfying -- I don't know --
10 particularly -- yeah, I'll just stop the
11 question there.

12 MR. BADALA: Objection to form.

13 A. I don't remember. I don't remember
14 anything that -- standing out, no.

15 Q. Any -- I guess I'll try it
16 different. Any, you know, significant drug
17 busts that you made during that time?

18 MR. BADALA: Objection to form.

19 Q. Whether that was number of people,
20 amount of drugs, anything like that.

21 MR. BADALA: Same objection.

22 A. I don't remember.

23 Q. Okay. Well, how about, then, moving
24 forward, starting with your time as a lieutenant
25 going forward; are there any -- any

1 investigations or -- investigations, arrests
2 where -- that stand out to you as being
3 particularly satisfying in making a --
4 particularly satisfying?

5 MR. BADALA: Objection to form.

6 A. I don't remember any standing out to
7 the point where -- that I could -- you know, I
8 don't remember any standing out.

9 Q. Okay. If the -- is there a priority
10 within the narcotics division today in terms of
11 the type of narcotic activity that you're trying
12 to curtail?

13 A. Yes.

14 Q. What's the top priority?

15 A. When I talk to the lieutenants and
16 the sergeants, our priority is the overdoses,
17 getting back to what's causing the overdoses.

18 When you talk to -- when you go to
19 these overdoses and the guys brief me on it, and
20 when you talk to the families, there's always
21 closure, they want something done. So I
22 guess -- I can't speak for them -- I'm sure they
23 get some satisfaction if they do trace that back
24 to the person that sold that lethal drug or --
25 you know, give them closure, I guess.

1 Q. And in that regard, is there --
2 within all of the different types of drugs that
3 are out there, is there -- my sense was -- I may
4 have this wrong. I think I read it in one of
5 the opiate task force reports or something --
6 that heroin was one of the principal overdose
7 causes. Is heroin a focus of the narcotics
8 division?

9 A. Heroin, fentanyl, the beginning
10 opiate pills. I think that all goes hand in
11 hand when you conduct some of these
12 investigations. My guys told me, speaking to
13 families and stuff like that, they didn't start
14 off with just heroin. So I think it all goes
15 hand in hand.

16 Q. Where is the heroin -- the people
17 who are overdosing on heroin in Cuyahoga County,
18 where does the heroin come from; do you know?

19 MR. BADALA: Objection to form.

20 Q. How is it getting to Cuyahoga
21 County?

22 MR. BADALA: Same objection.

23 A. I don't know. I don't know. I
24 couldn't answer that.

25 Q. Same question for the fentanyl?

1 MR. BADALA: Objection to form.

2 A. Again, I don't know.

3 Q. Okay. And same question for the
4 prescription medications?

5 MR. BADALA: Objection to form.

6 A. Just based on the interviews you
7 conduct, it's -- it's coming from usually some
8 type of injury they had had in the past, and I
9 guess that stems into the illegal drugs.

10 Q. Are the folks who are investigating
11 these overdose scenes -- are they supposed -- do
12 they ask whether the victim, the decedent, used
13 alcohol?

14 A. I think they -- I mean, I can't
15 speak for what they're exactly saying, but I
16 think they inquire about their past, whether it
17 be alcohol, drug abuse or anything that can help
18 out with the investigation. Sometimes that
19 information is offered, especially if it's a
20 family member that you're talking to. They'll
21 let you know.

22 Q. Did they ask about, like, nicotine
23 addiction?

24 A. It's possible.

25 Q. You don't know one way or the other?

1 A. I don't know.

2 Q. Okay.

3 - - - - -

4 (Thereupon, Gerome Deposition
5 Exhibit 2, E-Mail String Beginning
6 Bates Number CUYAH_00018717, was
7 marked for purposes of
8 identification.)

9 - - - - -

10 Q. Captain, take a minute to look at
11 this. I'll preview for you. I had asked you
12 earlier about -- if you knew about something
13 called the Heroin and Opioid Action Plan
14 Committee.

15 A. Okay.

16 Q. I'm going to describe this for the
17 record. Please take a look at it. Not a lot of
18 text, a lot of e-mails. But this Gerome Exhibit
19 2 is an e-mail chain from -- the most recent in
20 time of which was from Hugh Shannon on August
21 5th, 2016 to a whole bunch of people. It bears
22 Bates label CUYAH 118717 through 719, and, sir,
23 you're included at least in the first e-mail 14
24 lines down right before Captain Michalosky.

25 A. Okay.

1 Q. Let me know when you've had a chance
2 to look at this. My question is going to be
3 whether this triggers any memories for you about
4 what the Heroin and Opioid Action Plan Committee
5 is.

6 A. Okay.

7 Q. So does that trigger any memory
8 bells about a heroin -- sorry, Heroin and Opioid
9 Action Plan Committee?

10 A. Yes, it does.

11 Q. Okay. What is -- what is that
12 committee?

13 A. I think -- I might have referred to
14 it with Carole Rendon heading up the committee.
15 I don't know if that's the same name that we
16 discussed before or not, but this is what I was
17 referring to, that she was at the U.S.
18 Attorney's Office. We used to meet.

19 Q. Used to meet?

20 A. Well, I've attended meetings on
21 behalf of the sheriff.

22 Q. Okay.

23 A. I think we referenced it earlier.

24 Q. Yes. Do you remember how many
25 meetings that you attended?

1 A. I don't remember.

2 Q. This is something different, though,
3 from the county opiate task force or -- is that
4 right, if you know?

5 A. I'd want to say they're either very
6 similar or it's the same group, just a different
7 name.

8 Q. And the first e-mail references from
9 Mr. Shannon -- do you know Mr. Shannon, Hugh
10 Shannon?

11 A. Yes, I do.

12 Q. Where does he work?

13 A. The medical examiner's office.

14 Q. Okay. Is he a doctor; do you know?

15 A. I don't know.

16 Q. His e-mail to everyone from August
17 of 2016, the last sentence says, "At this time,
18 nothing out of the ordinary has been detected by
19 our labs other than the deadly heroin and
20 fentanyl and combinations we have been seeing."

21 Do you have an understanding as to
22 what the reference to "deadly heroin and
23 fentanyl and combinations" --

24 MR. BADALA: Objection to form.

25 Q. -- is?

1 MR. BADALA: Objection to form.

2 A. I'm sorry. Could you repeat it?
3 Are you asking me to interpret what he's saying?

4 Q. No. I'm trying not to do that, so
5 we can set the sentence aside.

6 Are you personally aware of any
7 issues, overdose issues, associated with heroin
8 and fentanyl combinations?

9 MR. BADALA: Objection to form.

10 A. Well, that's what -- I mean, our
11 detectives have investigated those.

12 Q. Okay. Is that -- has that been
13 increasing or decreasing in frequency over time,
14 that --

15 MR. BADALA: Objection.

16 Q. -- the overdose being a result of
17 some sort of heroin and fentanyl combination?

18 MR. BADALA: Objection to form.

19 A. I'm not sure I understand the
20 question you just asked. If it's -- I'm not
21 sure I understand that.

22 Q. Do you -- do you know whether
23 there's been a change at all in the trend --
24 in -- a trend change in terms of what people are
25 overdosing on in Cuyahoga County?

1 MR. BADALA: Objection to form.

2 A. I'm not aware of the trend change,
3 no.

4 Q. Okay. So -- okay. Fair enough.

5 Do you view Cuyahoga County as
6 having -- there being a problem in Cuyahoga
7 County with respect to prescription --
8 prescription opioid abuse?

9 A. Yes.

10 Q. Okay. When did that start?

11 A. The actual abuse or when --

12 Q. When did it become a problem?

13 A. Well, I think this past year it's
14 come out in the media as far as the attorney
15 general, president and the county executive
16 saying, hey, we have an epidemic problem here.
17 But, again, I refer back to when I became
18 lieutenant of the narcotics division and the
19 programs that were put in place that, you know,
20 there was -- there was the need for these
21 programs.

22 Q. And you became a lieutenant in 2014?

23 A. Yes, sir.

24 Q. And the programs that were -- there
25 were programs that were in place that predated

1 your becoming a lieutenant?

2 A. Yes.

3 Q. All right. What do you believe the
4 cause of the -- well, do you believe that there
5 is an opioid epidemic in Cuyahoga County?

6 MR. BADALA: Objection to form.

7 A. Yes.

8 Q. What -- what are the parts of that
9 opioid epidemic or what are you including within
10 that?

11 MR. BADALA: Objection to form.

12 A. I'm speaking to detectives that
13 respond to these overdoses. I think I mentioned
14 before a lot of these are traced back to
15 prescription opioids, and I think that the same
16 underlying story is that when these people --
17 and I hate to just refer to them as "these
18 people," but when they can't get those
19 prescription drugs anymore, that they turn to
20 the street drug, heroin, fentanyl, whatever can
21 satisfy that craving they have. A lot of young
22 kids have been affected by this, too.

23 So detectives, you know, they tell
24 me about the stories. Parents. We have parents
25 that call the office, want updates on the

1 investigation. They want some type of closure.
2 They want to know if something is being done
3 about, you know, why their son, daughter,
4 whatever loved one, is dead due to this, so --
5 I'm sorry if I didn't answer the question, but
6 --

7 Q. That's helpful. So I want to make
8 sure I understand, though. It sounds like
9 you're including within the opioid epidemic --
10 you're including the use and abuse of heroin as
11 part of that epidemic.

12 A. Well, I think it all ties in. Like
13 I stated, if you can no longer get the
14 prescription medication that you're craving,
15 you're going to find a way to satisfy that
16 craving through heroin, fentanyl, illegal drugs.

17 Q. Have you ever -- have you ever
18 personally talked to any of those family
19 members?

20 A. I've talked with members on the
21 phone before, yes.

22 Q. And when you say they want closure,
23 what -- has a family member ever communicated to
24 you that he or she wants closure related to a
25 family member who overdosed?

1 A. Yes.

2 Q. And what do they -- when they say
3 they want closure, what are they -- are they
4 asking you specifically to do something, arrest
5 somebody?

6 MR. BADALA: Objection to form.

7 A. You know, it's a judgment on what
8 they're referring to. We try to -- I think if
9 they're referring to the person that sold them
10 these drugs, that could be closure. So, you
11 know, that's the way I see it.

12 Q. Family members that you've talked
13 to, have they ever asked you specifically, "Do
14 you have any leads on who sold my son or
15 daughter the heroin"?

16 A. Correct. Yes, they've asked that.

17 Q. Have any of these family members
18 ever asked you anything related to prescription
19 drugs?

20 A. Yeah. I think they've mentioned --
21 I don't remember every conversation I've had
22 with family members.

23 Q. Do you remember any specific
24 conversation --

25 MR. BADALA: Hold on.

1 Were you finished with your answer?

2 THE WITNESS: No. I was just going
3 to elaborate a little bit.

4 Q. Please.

5 A. Yeah. I don't remember every
6 conversation I've had with every family member,
7 but they -- whenever you have a family member,
8 they like to tell you the background of their
9 loved one that died, so that conversation has
10 come up before as far as prescription
11 medication.

12 Q. Has a family member ever asked you
13 to do anything related to prescription
14 medications?

15 MR. BADALA: Objection to form.

16 A. Not that I remember, no.

17 Q. Are there any other causes -- is the
18 only cause -- am I understanding your testimony
19 correctly that the only cause -- you think the
20 only thing that causes heroin use is prior use
21 of prescription medications?

22 MR. BADALA: Objection to form.

23 A. I can't say it's a hundred percent
24 the only cause, no.

25 Q. Okay. What are other causes of

1 heroin use?

2 MR. BADALA: Objection to form.

3 A. I don't know. I'm not a heroin user
4 so I can't answer why people do it.

5 Q. All right. Well, is that something
6 you've done any -- received any training or done
7 any study of?

8 MR. BADALA: Objection to form.

9 A. No, I haven't.

10 Q. Same question with respect to
11 fentanyl. Have you done -- received any
12 training on why people use fentanyl?

13 A. Training, no.

14 Q. Have you done any studies as to why
15 people use fentanyl?

16 A. No, I have not.

17 MR. BLOCK: We'll go a little
18 further and then break for lunch, just a few
19 more minutes here.

20 Q. Have you ever heard of the term
21 "diversion" as it relates to prescription
22 opioids?

23 A. I'm not familiar with that, no.

24 Q. Okay. Have you -- has the sheriff's
25 department ever investigated -- to your

1 knowledge, ever investigated theft of
2 prescription opioids, whether, you know, taken
3 from somebody's house, from a doctor's office,
4 from a pharmacy?

5 MR. BADALA: Objection to form.

6 A. I don't remember it, no.

7 Q. All right. How about investigating
8 people forging prescriptions?

9 A. Not that I'm aware of, no.

10 Q. Pill sharing, so someone who had a
11 prescription for a prescription opioid who was
12 sharing it with friends or family?

13 MR. BADALA: Objection to form.

14 A. Not that I remember, but -- I can go
15 back. I think -- we have had people enter the
16 building, our county buildings, with
17 prescription pills on them that aren't --
18 doesn't have their name on them, so there are
19 some investigations that have taken place or
20 charges -- I don't know specifics of it, but I
21 know that has happened within our department.

22 Q. If that's happened, which unit
23 within the department is responsible for
24 investigating that?

25 A. It could be as simple as the person

1 that found it. They can do that case on their
2 own. But that has happened.

3 Q. Do you know whether the department
4 has ever arrested anyone for -- in connection
5 with -- are you familiar with the term "doctor
6 shopping"?

7 A. Yes.

8 Q. All right. Do you know whether the
9 sheriff's department has ever made any arrests
10 of anybody who was -- because they were doctor
11 shopping?

12 A. I was not briefed on that, but
13 again, we kind of -- if we get a tip or have
14 information on that, we turn that over to our
15 DEA task force.

16 Q. Are you familiar with -- have you
17 heard the term "pill mill"?

18 A. I've heard the term.

19 Q. What do you understand that to mean?

20 A. I don't know. To be honest with
21 you, I don't know.

22 Q. Have you ever heard of about either,
23 like, pharmacies that had a reputation for being
24 a place where people could go to get liberal
25 supply of opioid medication, prescription

1 opioids?

2 MR. BADALA: Objection to form.

3 A. You'd have to repeat that. I'm
4 sorry. I didn't catch all that.

5 Q. Okay. Well, you said you've heard
6 the term "pill mill." Where have you heard
7 that?

8 A. Probably media, something like that.
9 It's not something I looked up or anything like
10 that. I just --

11 Q. Has the sheriff's department ever
12 investigated any business, building, where,
13 like, people seem to be going in -- of whatever
14 sort it was, people seem to be going in and
15 coming out with prescription medications?

16 A. I'm not aware of any investigations
17 that happened like that, no.

18 Q. Are you aware of any such a building
19 anywhere within the limits of Cuyahoga County at
20 any point in time?

21 MR. BADALA: Objection to form.

22 A. I don't know.

23 Q. You don't know one way or the other?

24 A. Right.

25 MR. BLOCK: Why don't we take our

1 lunch break now.

2 THE VIDEOGRAPHER: Off the record,
3 12:14.

4

5 (Luncheon recess taken.)

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

- - - - -
(Thereupon, Gerome Deposition
Exhibit 3, Cuyahoga County Sheriff's
Department 2015 Annual Report, was
marked for purposes of
identification.)
- - - - -

THE VIDEOGRAPHER: On the record,
12:55:

- - - - -
AFTERNOON SESSION
CONTINUED EXAMINATION OF DONALD GEROME
BY MR. BLOCK:

Q. Captain Gerome, Exhibit 3 is a
document entitled "Cuyahoga County Sheriff's
Department Annual Report," the 2015 annual
report. It has -- it bears Bates label CUYAH
120708 through 120760.

Have you seen the sheriff's
department annual reports before?

A. Yes, sir.

Q. And I want to -- of course I just
lost it, but I want to focus on page -- the page
with your name on it, which is -- it's got Bates
number 120745 at the bottom. Let me know when

1 you're there.

2 A. Okay.

3 Q. Yes, we're on the same one that --
4 the heading at the top of the page is "CCSD
5 Package Interdiction Team." Is that the page
6 you're on?

7 A. Yes, sir.

8 Q. Okay. Did you -- it's got your name
9 at the bottom?

10 A. Yes, it does.

11 Q. All right. So did you provide the
12 information that's reflected on this page for
13 inclusion in the annual report?

14 A. I provided this information to the
15 sheriff's secretary, who puts this all together.

16 Q. Okay. So I just want to go through
17 and make -- see if I can understand what's being
18 reported here.

19 Under -- it's got a bunch of numbers
20 for 2015 totals. The -- one of which is
21 arrests, and then it says -- if I'm following it
22 across -- 13?

23 A. Yes, sir.

24 Q. All right. What -- 13 arrests of
25 what, or for what?

1 A. Can I just read the top section real
2 quick since this was a couple years ago? I just
3 want to make sure I'm looking at it right.

4 Q. Yes.

5 A. Okay. I'm sorry.

6 Q. I think it says 13 arrests.

7 A. Yes, sir.

8 Q. And what would be included in the --
9 arrests for what?

10 A. This list is -- was -- I think I
11 mentioned him, Detective Twombly, who is a K9
12 detective -- I think I mentioned the K9 unit --
13 works with the postal inspector. This
14 information comes from him and his unit. And
15 the 13 arrests are probably the arrests he had
16 for 2015.

17 Q. Okay. Let me just -- I want to make
18 sure that's right because I want to jump down.
19 There's a line for heroin overdoses.

20 Do you see that?

21 A. Yes, sir.

22 Q. And it says 44, if I'm following it
23 correctly across, or is it -- yeah, I think so.
24 Yeah, so 44 heroin overdoses?

25 A. Yes.

1 Q. Okay. Do you know where that
2 information comes from? That's not -- that
3 didn't -- is that limited to what the K9 officer
4 saw?

5 A. I don't know where he got that
6 information, but no, that wouldn't be just the
7 K9 officer responding to that.

8 Q. Okay. And how about beneath it, it
9 says, "Interviews, 66." Do you know what is
10 intended to be encompassed within that category?

11 A. That's probably interviews, field
12 interviews he conducted.

13 Q. Okay. So then we go up to -- from
14 heroin overdoses, it says "pills" and then the
15 number is 77. 77 what?

16 A. I don't remember what that number
17 stood for.

18 Q. Okay. The same question with
19 respect to heroin. It says 30 is the number.
20 Do you know 30 what?

21 A. No, I don't remember.

22 Q. All right. So let's look at -- tell
23 me again, before I hand you this one, what was
24 the name of the deputy, the sergeant?

25 A. That supplied this information to

1 me?

2 Q. Yes.

3 A. I'm pretty sure it was Deputy Mike
4 Twombly, T-w-o-m-b-l-y, and he's our K9
5 detective assigned to the postal inspector's
6 office.

7 Q. All right. And do you recall
8 providing any information to the -- for the
9 annual report related to the operations of the
10 larger narcotics division?

11 A. Do I -- I'm sorry. Do I recall
12 giving any?

13 Q. Yes.

14 A. I don't recall it, but if I was the
15 lieutenant at the time, I probably did.

16 - - - - -

17 (Thereupon, Gerome Deposition
18 Exhibit 4, Cuyahoga County Sheriff's
19 Department 2016 Annual Report, was
20 marked for purposes of
21 identification.)

22 - - - - -

23 Q. So Gerome Exhibit 4 is the Cuyahoga
24 County Sheriff's Department 2016 annual report,
25 bears the Bates number CUYAH 121572 through

1 121804, and there's a similar page. I want to
2 specifically ask you about the page 121789,
3 which has 2016 totals for categories similar to
4 what we looked at on the prior.

5 A. Okay.

6 Q. And this says that Lieutenant Sharpe
7 submitted it. Do you know whether this -- do
8 you know what the data on this page -- where it
9 comes from?

10 A. Again, this is probably provided by
11 Detective Twombly.

12 Q. Okay. And for heroin overdoses, it
13 looks like -- it looks like it's 75 -- well,
14 wait. Is that right, 75, heroin overdoses?

15 A. Yes.

16 Q. Is it 75 or 66? I can't tell.

17 A. It's 75.

18 Q. 75, okay. That's -- does that sound
19 about right to you in terms of the number of
20 overdoses that the narcotics unit investigated
21 in 2016?

22 A. It's probably accurate, yeah.

23 Q. Okay. Do you know whether there's a
24 2017 annual report?

25 A. There should be, yes.

1 Q. Okay. Have you seen it?

2 A. The annual reports are e-mailed out.
3 I'm not sure if I got that e-mail or not or if I
4 looked at it.

5 Q. On the next page -- well, it doesn't
6 matter. Do you know Sergeant Monteleone?

7 A. Monteleone, yes, sir.

8 Q. Monteleone. Who is he?

9 A. Sergeant with the department. Right
10 now he's in charge of our warrant unit.

11 Q. Okay. Has he ever worked in the
12 narcotics unit?

13 A. Yes.

14 Q. When was that?

15 A. As a supervisor or just in general?
16 He was -- when I was -- back in 2005, he was a
17 detective in the unit. He was also assigned to
18 a task force, if I remember correctly. I don't
19 know if he was a -- I don't remember if he was a
20 direct supervisor of the narcotic division. I
21 know he was in it as our evidence sergeant. He
22 may have had maybe dual assignments at the time.
23 I'm sorry. If you give me a second. I'm just
24 trying to remember.

25 Q. Yeah.

1 A. I think he was -- when I made
2 lieutenant, he was one of the sergeants in
3 charge of the narcotics division --

4 Q. Okay.

5 A. -- if I remember correctly, yeah.

6 Q. Okay. Great. Then I was going to
7 mark this as Gerome 5.

8 - - - - -

9 (Thereupon, Gerome Deposition
10 Exhibit 5, Cuyahoga County Sheriff's
11 Department Newsletter dated April
12 2017 Beginning Bates Number
13 CUYAH_000118584, was marked for
14 purposes of identification.)

15 - - - - -

16 Q. Please take a minute to look at
17 this. I'm -- just so you know, I'm focused on
18 the article or story on the second page entitled
19 "Fighting an Epidemic."

20 A. Okay.

21 Q. But I'll note for the record, Gerome
22 4 is a -- Gerome 5 am I on -- thank you -- is a
23 document entitled "Cuyahoga County Sheriff's
24 Department Newsletter," April '17. It has the
25 Bates label CUYAH 118584 through 118585. Let me

1 know when you've had a chance to read that.

2 A. Oh, okay. Sure.

3 Okay.

4 Q. By the way, are you familiar with
5 the sheriff's newsletter?

6 A. Yes, sir.

7 Q. Does it come out monthly?

8 A. Quarterly.

9 Q. Quarterly, okay. Who's in charge of
10 it in terms of the content that goes into it?

11 A. Again, the information I think is
12 submitted to his secretary, Tara, and then she
13 puts it all together.

14 Q. And who gets a copy of the
15 newsletter?

16 A. Everyone in the sheriff's department
17 can get a copy, yeah, anyone that has -- or
18 wants it.

19 Q. Okay. Do you know if they circulate
20 it outside of the department?

21 A. That, I don't know. I don't know.

22 Q. Do you know whether -- in April of
23 2017 whether Sergeant Monteleone was -- had any
24 responsibilities with the narcotics unit?

25 A. I want to say he was in charge of

1 our evidence at that time.

2 Q. And did you get a chance to read his
3 article, the "Fighting an Epidemic"?

4 A. Before it was submitted to Tara
5 or --

6 Q. Sure.

7 A. I'm sorry. Go ahead.

8 Q. I meant sitting here -- did you get
9 a chance to look at it when I handed you the
10 exhibit?

11 A. Yes.

12 Q. Okay. Did you see anything
13 erroneous in his article?

14 MR. BADALA: Objection to form.

15 A. I don't know about erroneous. Maybe
16 misleading with the 14 overdoses.

17 Q. What's misleading about that?

18 A. Well, in a sense -- he said
19 responded to 14 overdoses in 2017. He maybe
20 should have clarified it with the first quarter
21 of 2017 that they responded to that. That might
22 be a little bit misleading.

23 Q. Sure.

24 A. I'm sorry. What was the original
25 question?

1 Q. Whether you saw any errors in what
2 he said.

3 A. No, I don't believe there were any
4 errors.

5 Q. Do you know how it is that he came
6 to contribute this piece to the newsletter?

7 MR. BADALA: Objection to form.

8 A. I think Tara sometimes sends out
9 e-mails to different units within the sheriff's
10 department, asking to submit a story or
11 something like that, and -- I don't know --
12 maybe she reached out to him and -- I don't know
13 if she reached out to me and I forwarded it to
14 him or not, but somehow it got to him to put a
15 story together.

16 Q. Okay. All right. Great. Well,
17 also, under "New Hires" it says there was a new
18 pharmacist. What's the pharmacist do for the
19 sheriff's department?

20 A. They would be inside the jail.

21 Q. Okay. Do you know whether the jail
22 pharmacy orders prescription opioid medications?

23 A. Not firsthand, no, I don't know.

24 Q. You talked a little bit before the
25 lunch break about conversations you think you

1 may have had with family members of overdose
2 victims. Do you remember that?

3 A. Yes, sir.

4 Q. How many of those conversations do
5 you think you've had?

6 MR. BADALA: Objection to form.

7 A. I don't know. I don't know a number
8 offhand.

9 Q. I mean, are we talking more than a
10 handful of times?

11 MR. BADALA: Objection to form.

12 A. What's a handful?

13 Q. Five, I guess.

14 A. Probably around that, five.

15 Q. Okay. Around that?

16 A. Probably, yes, sir.

17 Q. Okay. And did you take any notes
18 for any of these conversations?

19 A. I may have written down their names
20 or whatever, just to follow up with -- you know,
21 with the detectives are doing or something like
22 that, but -- so yeah, I guess. Yes.

23 Q. Do you remember the names of any of
24 the folks you talked with?

25 A. No, sir.

1 Q. When was the most recent
2 conversation?

3 A. I don't remember.

4 Q. Was it -- have you had --

5 A. It hasn't been -- I'm sorry. Finish
6 your question, please.

7 Q. Have you had a conversation with
8 someone this year?

9 A. I don't remember.

10 Q. Did you have a conversation -- were
11 any of these conversations in 2017?

12 A. I don't remember specific dates. It
13 could have been.

14 Q. Were any of these conversations when
15 you were a lieutenant?

16 A. I don't remember.

17 Q. How long were -- were the
18 conversations?

19 MR. BADALA: Objection to form.

20 A. For the most part, it would be a
21 couple minutes, nothing more.

22 Q. Did you make any recording of the
23 conversations?

24 A. No, sir.

25 Q. Thank you.

1 Have you ever heard of a
2 Dr. Feldman, who was charged in 2006 with
3 trafficking opioids through his medical clinics?

4 A. No, sir.

5 Q. Does that ring a bell to you?

6 A. No, it does not.

7 Q. Okay. See if this helps at all. As
8 I understand, the doctor then was on trial in
9 2008 and committed suicide while the trial was
10 going on. Does that ring a bell at all?

11 A. No, sir.

12 Q. Have you -- do you know whether the
13 sheriff's department has ever received a tip
14 that someone was trafficking, selling,
15 distributing otherwise prescription medications?

16 MR. BADALA: Objection to form.

17 A. I think we discussed that. I'm not
18 aware of any specific tip coming in like that.

19 Q. Okay. And if there were -- if the
20 sheriff's department had gotten such a tip that
21 somebody was involved with trafficking
22 prescription medications, where would -- who
23 would have that been directed to?

24 MR. BADALA: Objection to form.

25 A. The tip itself?

1 Q. Yes.

2 A. It depends how the tip came in. It
3 would have -- like I said before, if it's a
4 Crime Stopper tip or it comes in through our
5 website, it would be directed to the supervisor
6 of the unit, narcotics unit at the time.

7 Q. Okay.

8 A. And that type of tip that we
9 discussed earlier would be probably forwarded to
10 the DEA task force.

11 Q. Okay. Have you ever had any
12 interactions with the State of Ohio Medical
13 Board?

14 A. Not that I remember, no.

15 Q. Did you see the story on Channel 7
16 recently about the medical board and whether the
17 medical board was -- you know, should have been
18 following up on doctors who were overprescribing
19 prescription opioids?

20 A. I don't know what Channel 7 is.

21 Q. I thought it was Channel 7.

22 A. But regardless, no, I don't.

23 Q. What is Fox here locally?

24 A. Fox is 8.

25 Q. All right. So maybe it was Channel

1 8. Have you seen a news story recently about
2 the medical board, the Ohio State Medical Board?

3 A. No, I don't remember seeing that
4 story.

5 Q. Okay. Have you ever had any
6 interactions with anyone at the Ohio Board of
7 Pharmacy?

8 A. No, I have not.

9 Q. Do you know whether anyone at the
10 sheriff's department has ever had interactions
11 with the Ohio Board of Pharmacy relating to
12 issues around opioids?

13 A. I don't know.

14 Q. And same question -- I should ask
15 whether you know whether anyone at the sheriff's
16 department has ever had any interactions with
17 the medical board regarding opioids?

18 A. I don't know.

19 Q. Are you aware of any pharmacies that
20 sold opioids or provided opioids improperly to
21 anybody in Cuyahoga County?

22 MR. BADALA: Objection to form.

23 A. I'm not aware of, no.

24 Q. Are you aware of any -- I may have
25 asked you this before. I apologize if I did --

1 of any investigations by the Cuyahoga Sheriff's
2 Department into prescription forgeries?

3 MR. BADALA: Objection to form.

4 A. I'm not aware of any ongoing
5 investigations involving that, no.

6 Q. Did you say "ongoing"?

7 A. Or past investigation, ongoing and
8 past.

9 Q. Okay. And within the sheriff's
10 department, which branch or department would
11 that -- if there were such investigations, who
12 would that fall under? Would that be something
13 narcotics would do?

14 A. Again, narcotics would take the
15 initial complaint and probably turn that over to
16 our task force officer.

17 Q. Okay. The DEA task force officer?

18 A. Yes.

19 Q. All right. Has it been the same
20 person at the DEA -- who's at the DEA now?

21 A. We have two detectives. Detective
22 John Gioitta and Detective Doug Jopek, and they
23 -- Doug Jopek has been recently assigned. We
24 had an agent there that resigned, took another
25 job. And then John Gioitta has been there

1 approximately, I think, two years.

2 Q. Who was there before Detective
3 Jeoeta?

4 A. Detective Lou Scibelli, or Deputy
5 Lou Scibelli now.

6 Q. All right. Is Deputy Scibelli still
7 with the sheriff's department?

8 A. Yes, he is.

9 Q. What's he doing now?

10 A. He's assigned to the uniform
11 division courts. I don't know specifically what
12 courts it is, but the courts division.

13 Q. Do you know how long he was with the
14 DEA task force?

15 A. He was assigned there when I got
16 into narcotics in 2014. I don't know his exact
17 date he moved over there.

18 Q. Do you know if there had been
19 someone there with DEA before him?

20 A. That, I don't know. I think we had
21 someone in the DEA since I've started with the
22 sheriff's department, but I don't know if it was
23 him or someone else.

24 Q. I was -- so I was going to also go
25 back -- in the '05 to '07 time frame, when you

1 were in the narcotics division, do you remember,
2 was there someone who was technically in the
3 narcotics division but was on assignment to the
4 DEA at that time?

5 A. Yes.

6 Q. Do you remember who it was?

7 A. It was now Sergeant Hirko.

8 Q. Okay. Any of these folks who have
9 been assigned to the DEA task force, have they
10 ever given a -- have they ever talked to the
11 rest of the people in the division about what it
12 is they either do or did over there?

13 MR. BADALA: Objection to form.

14 A. Yes. I mean, if I understand
15 your -- yeah, there's constant communication.
16 There's -- we help them out, they help us out,
17 resources, manpower. If there's a search
18 warrant, we'll ask them to assist if they have
19 the manpower; and vice versa, if they have a
20 search warrant, our guys are available.

21 Q. Can you think of any, you know,
22 ideas or suggestions that someone has made to
23 the sheriff's department based on, you know,
24 hey, DEA had this great idea or technique of X,
25 we should try that in our own investigations?

1 A. Not that I remember.

2 Q. Okay. Vice versa, where you guys
3 came up with something good that the -- your
4 person at the DEA task force brought to the task
5 force's attention, said we should really be
6 trying this program or this technique?

7 MR. BADALA: Objection to form.

8 A. Not that I remember.

9 Q. Does the sheriff's department do
10 anything to -- do anything at all related to
11 internet sale of opioid medications, monitor,
12 investigate, anything like that?

13 A. I'm not sure I understand that
14 question.

15 Q. Is the ordering of prescription
16 opioids over the internet -- is that something
17 that the sheriff's department has any
18 involvement in?

19 A. I'm not aware of any of our guys
20 investigating that or prior investigating that.

21 Q. Have you heard of a suspicious --
22 have you heard of the phrase "suspicious order"
23 as it relates to prescription opioids?

24 A. I can -- I've never heard of it, but
25 it's kind of self --

1 Q. I'm sorry. Do you know whether
2 anyone at the sheriff's department has ever been
3 involved with any investigations into any
4 pharmacy related to suspicious orders of
5 opioids?

6 A. No. Again, I think anything that
7 would come in like that, we'd turn over to the
8 DEA.

9 Q. Same question, anybody at the
10 sheriff's department involved with any
11 investigation into any distributor related to
12 suspicious orders of opioids?

13 A. Not that I'm aware of.

14 Q. All right. And any investigation
15 into any manufacturer regarding suspicious
16 orders of opioids?

17 A. Not that I'm aware of.

18 Q. Can we go to -- can I get tab 2,
19 please?

20 - - - - -

21 (Thereupon, Gerome Deposition
22 Exhibit 6, E-Mail String Beginning
23 Bates Number CUYAH_000118362, was
24 marked for purposes of
25 identification.)

1 - - - - -

2 Q. While you're taking a minute to
3 look -- while you're reviewing this, Captain
4 Gerome, I'll state for the record that Gerome
5 Exhibit 6 is an e-mail chain, most recent of
6 which was September 5th, 2016 from Thomas Gilson
7 to a whole bunch of people, bears the Bates
8 numbers CUYAH 118362 through 63. And I am
9 pretty sure I can find your name in the
10 distribution list here if I hunt for it. Yes.
11 I think I see your name, sir, four lines up from
12 the bottom in the -- in the most recent e-mail
13 in the chain.

14 A. Yes, sir, I see it.

15 Q. Okay. And I think a similar
16 position in the lower down e-mail chain.

17 So is this an e-mail, you, you know,
18 I guess received in the ordinary course of
19 business back in 2016?

20 A. Okay. I'm sorry. Can you repeat
21 that?

22 Q. Is this an e-mail that you received
23 in the ordinary course of business back in
24 September of 2016?

25 A. The -- I guess the second page is

1 the alert that comes out, just explaining the
2 whole thing here, that -- with the reported by
3 Parma Police Department, that's the alert that
4 is sent out via e-mail to everyone on this list,
5 and then the -- and then the sentence that I
6 think you're referring to is a -- just from
7 Dr. Gilson commenting on the alert, I guess.

8 Q. Okay. So let's break that up and
9 I'll ask a few follow-up questions.

10 Who is Dr. Gilson?

11 A. Dr. Gilson is the medical examiner
12 of Cuyahoga County.

13 Q. Okay. How long has he been the
14 medical examiner?

15 A. Sir, I don't know that answer.

16 Q. Was he the medical examiner when you
17 were the lieutenant?

18 A. Yes, I believe so.

19 Q. Okay. And then you said that the --
20 I guess it's the initial e-mail in the chain you
21 referred to as "the alert." Is that --

22 A. Yeah. I think we spoke briefly on
23 it. An alert goes out to our detectives,
24 myself, supervisors, announcing a heroine
25 overdose, or -- I'm sorry, a suspected heroin

1 overdose scene. That's what you're looking at
2 on the second page. That's the information
3 that's provided.

4 Q. And where it says "XX2016-03490,"
5 does that -- what does that number code refer
6 to?

7 A. I don't know. That comes from the
8 medical examiners.

9 Q. Okay. Is that something that you
10 use or apply?

11 A. No, it's not.

12 Q. Do you know --

13 A. Well, can I backtrack?

14 Q. Please.

15 A. I don't know if detectives actually
16 use this to relate the heroine overdose medical
17 examiner case number to our case number. So
18 they may. I don't know.

19 Q. Do you know whether someone from the
20 county sheriff's office responded to this scene?

21 A. It's most likely not based on it
22 was -- looked like it happened in Parma.

23 Q. Okay. But this is the type of alert
24 that you were describing earlier, that if it
25 were somewhere within a jurisdiction where, I

1 guess, you hadn't been uninvited, the sheriff's
2 department would send two detectives to respond
3 to the scene?

4 A. I don't know if the term "uninvited"
5 is correct, but, yeah, this is an agency that
6 handles their own overdose scenes.

7 Q. Okay. All right. Got it.

8 And then in the top e-mail
9 Dr. Gilson is commenting in his second sentence,
10 it says, "Might be carfentanil." Do you know
11 what carfentanil is?

12 A. Yes, sir.

13 Q. What's carfentanil?

14 A. From my understanding, it's a form
15 of fentanyl, but I don't know how many times
16 stronger, used basically with animals as a
17 sedative, pain reliever, something like that.

18 Q. And there are people overdosing on
19 that now?

20 A. Yes, sir.

21 Q. Where is -- do you know, how are
22 they getting the carfentanil?

23 A. I don't know that, sir.

24 Q. Do you know where it's coming from?

25 MR. BLOCK: Objection to form.

1 A. No, I don't.

2 Q. Is that something that the sheriff's
3 department is working on investigating, trying
4 to figure out how and where the carfentanil is
5 coming from?

6 MR. BADALA: Objection to form.

7 A. I think any time you open an
8 investigation, you want to try to find out as
9 much information about it as possible. I don't
10 know if there's any leads into where it comes
11 from or not.

12 Q. Do you know whether the sheriff's
13 department has made any arrests related to the
14 distribution of carfentanil?

15 A. I'm not aware of arrests with
16 carfentanil involved.

17 Q. Okay. Are there -- I don't want you
18 to comment on the substance, but are there
19 active investigations currently into -- related
20 to carfentanil distribution by the sheriff's
21 department?

22 A. I don't know.

23 Q. Dr. Gilson's first sentence has a
24 reference to the -- that most have had -- well,
25 let me see. I can skip that. Let's go to the

1 scene alert.

2 A. On page 2?

3 Q. Yes. It talks about the -- 29Y/O.
4 That's years old?

5 A. Yes, sir.

6 Q. And WF, white female?

7 A. Yes.

8 Q. She was found dead in the -- found
9 on bathroom floor expired at Bar 30, and then it
10 goes on to say "with drug paraphernalia next to
11 her."

12 In your experience, what is drug
13 paraphernalia? What does that term include?

14 A. That can include a needle, syringe,
15 baggies, any way to -- I'm trying to think of --

16 Q. Anything else come to mind for
17 paraphernalia?

18 A. It could be a pill -- a pill bottle.

19 Q. If the person -- would you expect --
20 you're familiar with these -- what do you call
21 these, scene alerts? What should we refer to --

22 A. Heroin scene alerts, I guess, yeah.

23 Q. Okay. In your -- do the heroin --
24 if there were prescription opioids found at the
25 scene of one of these instances that resulted in

1 an alert, does the alert normally state that?

2 A. I'd have to look back on all the
3 alerts that came out. I don't know specifically
4 if it does or not.

5 Q. All right. Are you familiar with --
6 do you get a copy of the -- do you get any
7 regular reports from the medical examiner -- do
8 you get reports from the medical examiner --
9 sorry. Let me try to spit this question out.

10 How often do you get reports from
11 the medical examiner, the sheriff's department
12 get reports from the medical examiner as they
13 pertain to overdoses?

14 MR. BADALA: Objection to form.

15 A. Hugh Shannon usually sends out maybe
16 something once a week updating, I guess,
17 statistics they keep at the medical examiner's
18 office.

19 Q. And when he sends something out, is
20 that by e-mail?

21 A. By e-mail.

22 Q. And does it have an attachment or is
23 it just sort of text of an e-mail?

24 A. Sometimes there's an attachment with
25 the stats involved. Sometimes it's as simple as

1 the e-mail stating six fatalities since last
2 weekend, no toxicology. It could state
3 anything.

4 Q. What do you do at the sheriff's
5 department, do with that information, if
6 anything?

7 A. I forward that to our detectives and
8 our supervisor of the department, Sergeant
9 Hirko.

10 Q. Sure. What does Sergeant Hirko do
11 with it?

12 A. I don't know. I don't know. It's
13 information sharing. Most of them are on this
14 e-mail as well. So just making sure they get
15 it.

16 Q. Have you heard of Project DAWN? I
17 think DAWN stands for deaths avoided with
18 naloxone.

19 A. Yes, sir.

20 Q. What is Project DAWN?

21 A. I wasn't involved in the start-up of
22 it, but my understanding is it's the
23 distribution of Narcan to first responders.

24 Q. Are there -- is there anyone within
25 the sheriff's department who's considered a

1 first responder?

2 A. Yes, sir.

3 Q. Who would that be?

4 A. We all are.

5 Q. Okay. So -- does anyone within the
6 sheriff's department carry -- is that the right
7 word -- naloxone?

8 A. We do distribute it. It's not a
9 policy we're required to carry it, but we do
10 hand it out. It's optional for them.

11 Q. Does the department -- does the
12 sheriff's department provide training to its
13 personnel on how to use naloxone?

14 A. The training -- again, you can
15 receive that training on the Attorney General's
16 website. It's probably a 15, 20-minute
17 presentation, and you do get a certification for
18 it, so we make sure before we distribute the
19 Narcan that they have that certification.

20 Q. How does the department get the
21 Narcan? Where does it come from?

22 A. The board of health supplied us, I
23 think, with initial -- I don't know how many,
24 but the board of health has been supplying us.

25 Q. Do you know whether the department

1 has to pay for the Narcan?

2 A. No, we don't. No, we have not paid.
3 The shipment I remember that we got, I don't
4 believe we paid anything. It was free.

5 Q. Are there any sort of reports kept
6 by the department in terms of how many times
7 someone at the department has used a Narcan kit?
8 Is it a kit?

9 A. It's -- yeah, you can call it a kit.

10 Q. Okay.

11 A. I don't think we've kept statistics
12 on that. I know of a couple instances that we
13 have saved lives. We've had, you know, stories
14 in the media, stuff like that. So I hear
15 stories about it, but as far as stats kept, it's
16 probably something we should start doing since
17 it's happening more often.

18 Q. Is abuse -- abuse of fentanyl a
19 problem in Cuyahoga County?

20 MR. BADALA: Objection to form.

21 A. Abuse of fentanyl, I don't know. I
22 don't know. I think it goes hand in hand with
23 heroin, pills. I think they all go hand in
24 hand.

25 Q. What about carfentanil?

1 A. Yes, sir. Yeah. I think it all
2 ties together.

3 Q. Are you aware of any reports or
4 information that at least some of the fentanyl
5 that's getting to folks in Cuyahoga County is
6 coming from China? Have you ever heard that?

7 MR. BADALA: Objection to form.

8 A. I don't have firsthand knowledge as
9 far as our investigations are concerned. I have
10 read articles and through media mentioning
11 fentanyl coming from China.

12 Q. Okay.

13 Are you aware of any reports about
14 Mexican drug trafficking cartel operations in
15 Cuyahoga County?

16 A. During some of the meetings I've
17 attended, we have -- the FBI has and the DEA has
18 briefed on some cartels that they may be
19 investigating. As far as our department, we --
20 we are not investigating drug cartels.

21 Q. Agree or disagree with the following
22 statement: Pills and heroin arrive in the county
23 through large, difficult to untangle networks.

24 MR. BADALA: Objection to form.

25 A. Agree or disagree?

1 Q. Yes.

2 A. Can you read that again?

3 Q. Sure.

4 Pills and heroin arrive in the
5 county through large, difficult to untangle
6 networks.

7 MR. BADALA: Objection to form.

8 A. I don't know if it's an agree or
9 disagree answer.

10 Q. I don't know. Could be a third
11 choice.

12 A. I mean, can you repeat it one more
13 time?

14 Q. Sure.

15 Pills and heroin arrive in the
16 county through large, difficult to untangle
17 networks.

18 MR. BADALA: Objection to form.

19 A. I probably disagree.

20 Q. And why?

21 A. It could be one form. There's all
22 different forms that illicit drugs come in,
23 prescription drugs come in. I don't know. I
24 can't pinpoint it.

25 Q. Do you have a -- do you know one way

1 or the other whether the networks by which the
2 drugs are coming into Cuyahoga County have
3 changed over time?

4 MR. BADALA: Objection to form.

5 A. Which drugs are we referring to?

6 Q. So have there been changes for any
7 drugs in terms of -- any type of drugs in terms
8 of how they've -- how they're getting into
9 Cuyahoga County?

10 MR. BADALA: Objection to form.

11 A. I don't think there's a change, no.
12 I'm not sure I understand that question
13 completely.

14 Q. Well, let's see. Was there -- was
15 there heroin in Cuyahoga County when you were a
16 deputy in the narcotics unit back in 2005?

17 A. Yes.

18 Q. All right. And did you have any
19 understanding back then as to where that heroin
20 was coming from?

21 A. I mean, you read reports that are
22 put out by DEA, the federal government, stuff
23 like that. That's kind of high-level stuff
24 that, you know, as part of narcotics, more
25 street level, so you hear about it, but we

1 didn't actively investigate any of that.

2 Q. Whose role or job did you view it as
3 to actively investigate, I guess, the
4 importation of the heroin into the county?

5 A. Well, there's always officers'
6 interdiction. I don't think it's particularly
7 assigned to one agency. Again, I think it goes
8 back to information sharing and resources that
9 are available. That's probably something that
10 we'd ask the DEA or the FBI or some federal
11 agency to help out with.

12 Q. And has your understanding changed
13 at all in terms of the way in which heroin is
14 ending up in the -- being used by people in
15 Cuyahoga County from 2005 to today?

16 A. Yeah. We see a lot more today,
17 based on, I think, the conversations we had
18 before, where it's linked to the prescription
19 opioids and people craving when they can't get
20 those opioids anymore.

21 Q. When you say "see a lot more,"
22 you're seeing more heroin being distributed than
23 back in 2005; is that what you're saying?

24 A. Yeah. We investigate a lot more
25 cases involving heroin, fentanyl.

1 Q. How about in terms of you
2 included -- or you mentioned prescription
3 opioids before. Do you have any understanding
4 into the various ways in which people who are
5 using prescription opioids obtain those
6 medications?

7 A. Prescriptions, I --

8 Q. Is there anyone -- do you have any
9 knowledge whether there's anyone in Cuyahoga
10 County who's used a prescription opioid who's
11 obtained the opioid other than through a
12 prescription from a doctor?

13 MR. BADALA: Objection to form.

14 A. Not firsthand knowledge. I'm not an
15 investigator. I'd have to ask our detectives if
16 they're actively investigating any of that.

17 Q. Okay. How about in any of the work
18 you've done with any of these task forces or
19 meetings? Do you have any understanding as to
20 the various ways in which people get access to
21 what we've been calling prescription opioids?

22 A. Well, I think you touched on it
23 before with not only prescribing it, but the
24 illegal prescriptions people try to obtain, the
25 theft. That's one of the reasons we have that

1 drop box program, so people can get rid of the
2 prescription opioids that they are not using
3 anymore, so there's no chance of theft or
4 getting out of their hands.

5 Doctor shopping, I believe you
6 mentioned that term.

7 So those are just some other ways I
8 think.

9 Q. And do you have any sense, you
10 personally, you know, in terms of percentages or
11 relative frequency, the extent to which somebody
12 uses a prescription opioid through a
13 prescription written by a doctor for a medical
14 condition versus any of those other improper
15 ways?

16 MR. BADALA: Objection to form.

17 A. I don't have percentages.

18 Q. Okay. Have you ever heard of
19 something called Bromadol?

20 A. Have I heard of the --

21 Q. Yes.

22 A. No.

23 Q. Or how about cyclopropylfentanyl?

24 A. No.

25 Q. Have you heard of mixtures of

1 fentanyl and cocaine? Is that something you've
2 seen in Cuyahoga County?

3 A. Yes, sir.

4 Q. And -- okay. Do you know how common
5 or frequent that is?

6 A. I see the reports that the medical
7 examiner sends out sometimes, but I don't have a
8 -- how prevalent it is.

9 Q. In terms of the person who would
10 have the best knowledge of the data at least for
11 overdose victims, would that be the medical
12 examiner, in terms of number of people and what
13 it -- what they overdosed on?

14 A. Yes.

15 Q. Okay. And that would be Dr. Gilson?

16 A. Yes, sir.

17 Q. All right. Has your department --
18 do you know whether the sheriff's department has
19 ever encountered any counterfeit pills? And by
20 that I mean, you know, something that looks like
21 a prescription medication but isn't, in fact,
22 you know, manufactured by someone with an FDA
23 license but is designed to look like it was?

24 MR. BADALA: Objection to form.

25 A. I'm not familiar with any specific

1 cases, but I wouldn't put it past it that we've
2 come across that.

3 Q. Would you agree that those who are
4 trafficking in narcotics are very creative in
5 terms of the ways in which they obtain, package
6 and distribute the narcotics?

7 MR. BADALA: Objection to form.

8 A. I'd agree, yeah, they are creative.

9 Q. Are you aware -- does your
10 department track -- or if I were trying to
11 figure out from the sheriff's department, would
12 I be able to -- is there something I could look
13 at to figure out how many arrests the sheriff's
14 department had made of someone who was
15 trafficking in heroin as opposed to someone who
16 was selling OxyContin?

17 A. With our new RMS system, I don't
18 know if you can query a certain type of arrest.
19 I'm not that knowledgeable about what the system
20 can and can't do since it's new. I'm not aware
21 of any spreadsheet or statistic keeping that
22 separated, what type of arrests we've had in the
23 narcotics division.

24 Q. When you said the new system, is
25 that TRAC or what were you --

1 A. TAC.

2 Q. TAC. Excuse me. Yes.

3 Do you know -- do you know who or
4 what Allergan is?

5 A. No, sir.

6 Q. All right. So do you have any view
7 on whether Allergan is -- has any responsibility
8 for the opioid epidemic in Cuyahoga County?

9 MR. BADALA: Objection to form.

10 A. No, I don't know.

11 Q. Are you familiar with Cardinal
12 Health?

13 A. I'm not familiar with them, no.

14 Q. Do you have any view as to whether
15 Cardinal Health has any responsibility for the
16 opioid problem in Cuyahoga County?

17 MR. BADALA: Objection to form.

18 A. I don't know.

19 Q. Walmart, are you familiar with
20 Walmart?

21 A. The Walmart that I can shop at every
22 day, then yes, I am familiar with Walmart.

23 Q. Okay. Does Walmart have any -- in
24 your view, have any responsibility for the
25 opioid problem in Cuyahoga County?

1 MR. BADALA: Objection to form.

2 A. I don't know.

3 Q. Have you heard of Actavis Pharma?

4 A. No.

5 Q. Do you have a view as to whether
6 Actavis Pharma has any responsibility for the
7 opioid problem in Cuyahoga County?

8 MR. BADALA: Objection to form.

9 A. I don't know.

10 Q. Insys, do you know what -- who or
11 what Insys is?

12 A. No, sir.

13 Q. Do you know whether Insys has any
14 responsibility for the opioid problem in
15 Cuyahoga County?

16 MR. BADALA: Objection to form.

17 A. I don't know.

18 Q. Watson Pharmaceuticals?

19 A. No, sir.

20 Q. Do you have a view as to whether
21 Watson Pharmaceuticals has any responsibility
22 for the opioid problem in Cuyahoga County?

23 MR. BADALA: Objection to form.

24 A. I don't know.

25 Q. Purdue Pharma, are you familiar with

1 Purdue Pharma?

2 A. I don't believe so, no.

3 Q. Okay. Do you have any view as to
4 whether Purdue Pharma has any responsibility for
5 the opioid problem in Cuyahoga County?

6 MR. BADALA: Objection to form.

7 A. I don't know.

8 Q. Cephalon, are you familiar with
9 Cephalon?

10 A. I think I've heard of that company,
11 but not familiar with it.

12 Q. Okay. Do you have a view as to
13 whether Cephalon has any responsibility for the
14 opioid problem in Cuyahoga County?

15 MR. BADALA: Objection to form.

16 A. I don't know.

17 Q. Noramco, are you familiar with
18 Noramco?

19 A. No, sir.

20 Q. Do you have any view as to whether
21 Noramco has any responsibility for the opioid
22 problem in Cuyahoga County?

23 A. I don't know.

24 Q. AmerisourceBergen, are you familiar
25 with AmerisourceBergen?

1 A. Never heard of them.

2 Q. Sometimes ABDC I think it's called.

3 A. Never heard of them.

4 Q. All right. Do you have any view as
5 to whether AmerisourceBergen has any
6 responsibility for the opioid problem in
7 Cuyahoga County?

8 MR. BADALA: Objection to form.

9 A. I don't know if they do, sir.

10 Q. How about Johnson & Johnson; are you
11 familiar with that company?

12 A. If they make baby powder. I don't
13 know if that's the same one or not. If it is,
14 then yeah, I'm familiar.

15 Q. And Janssen, have you heard of
16 Janssen?

17 A. No.

18 Q. The pharmaceutical company?

19 A. No.

20 Q. And do you have a view as to whether
21 Johnson & Johnson and/or Janssen have any
22 responsibility for the opioid problem in
23 Cuyahoga County?

24 MR. BADALA: Objection to form.

25 A. I don't know what they do, sir.

1 Q. How about McKesson; are you familiar
2 with McKesson?

3 A. No.

4 Q. And do you have a view as to whether
5 McKesson has any responsibility for the opioid
6 problem in Cuyahoga County?

7 MR. BADALA: Objection to form.

8 A. Again, I don't know what they do.

9 Q. H.D. Smith, have you heard of H.D.
10 Smith?

11 A. No, sir.

12 Q. And do you have a view as to whether
13 H.D. Smith has any responsibility for the opioid
14 problem in Cuyahoga County?

15 MR. BADALA: Objection to form.

16 A. I don't know.

17 Q. Don't worry. I don't have too many
18 more of these.

19 Walgreens?

20 A. Yes, I've heard of Walgreens.

21 Q. All right. Do you have a view as to
22 whether Walgreens has any responsibility for the
23 opioid problem in Cuyahoga County?

24 MR. BADALA: Objection to form.

25 A. I don't know.

1 Q. CVS?

2 A. I've heard of CVS, yes.

3 Q. Do you have a view as to whether CVS
4 has any responsibility for the opioid problem in
5 Cuyahoga County?

6 MR. BADALA: Objection to form.

7 A. I don't know.

8 Q. Okay. Rite-Aid, are you familiar
9 with Rite-Aid?

10 A. Yes, I'm familiar.

11 Q. In your view, does Rite-Aid have any
12 responsibility for the opioid problem in
13 Cuyahoga County?

14 MR. BADALA: Objection to form.

15 A. I don't know.

16 Q. Mallinckrodt. Hopefully I
17 pronounced that close to correct. Are you
18 familiar with Mallinckrodt?

19 A. No, I'm not.

20 Q. And do you have a view as to whether
21 Mallinckrodt has any responsibility for the
22 opioid problem in Cuyahoga County?

23 MR. BADALA: Objection to form.

24 A. I don't know.

25 Q. Endo Pharmaceuticals, do you know

1 Endo?

2 A. No, sir.

3 Q. And do you have a view as to whether
4 Endo Pharmaceuticals has any responsibility for
5 the opioid problem in Cuyahoga County?

6 MR. BADALA: Objection to form.

7 A. I don't know.

8 Q. Health Mart Systems?

9 A. No, sir.

10 Q. And do you have a view as to whether
11 Health Mart Systems has any responsibility for
12 the opioid problem in Cuyahoga County?

13 MR. BADALA: Objection to form.

14 A. No, I don't know, sir.

15 Q. Teva Pharmaceuticals?

16 A. No.

17 Q. And do you have a view as to whether
18 Teva Pharmaceuticals has any responsibility for
19 the opioid problem in Cuyahoga County?

20 MR. BADALA: Objection to form.

21 A. I don't know, sir.

22 Q. How about the federal government;
23 does the federal government have any
24 responsibility for the opioid problem in
25 Cuyahoga County?

1 MR. BADALA: Objection to form.

2 A. I don't know, sir.

3 Q. The state government, State of Ohio?

4 MR. BADALA: Objection to form.

5 A. Have I heard of them?

6 Q. Yes.

7 A. Yes.

8 Q. Go Bucks.

9 And does the State of Ohio have any
10 responsibility for the opioid problem in
11 Cuyahoga County?

12 MR. BADALA: Objection to form.

13 A. I don't know.

14 MR. BLOCK: Why don't we take a
15 break.

16 MR. BADALA: Yes. Great.

17 THE VIDEOGRAPHER: Off the record,
18 1:50.

19 (Recess had.)

20 THE VIDEOGRAPHER: On the record,
21 2:06.

22 BY MR. BLOCK:

23 Q. Captain Gerome, we were talking
24 about different entities and whether they have
25 any responsibility for the opioid problem in

1 Cuyahoga County.

2 Would -- in your view, do the people
3 who are selling heroin and fentanyl to others in
4 Cuyahoga County -- do they have responsibility
5 for the opioid problem in Cuyahoga County?

6 MR. BADALA: Objection to form.

7 A. I think there's a certain level of
8 responsibility. It's illegal activity. But I
9 think the market is created for them to take
10 advantage of it. Like I think I referred to it
11 before, is people coming off prescription
12 medications are still craving it, and this is
13 where they turn towards, and drug dealers are
14 just -- it's open season for them to make some
15 money.

16 Q. And could we agree that wherever the
17 drug dealers are getting their drugs from, that
18 whoever is supplying them with the drugs also
19 has some responsibility for the opioid problem
20 in Cuyahoga County?

21 MR. BADALA: Objection to form.

22 A. Well, yeah, they have to take
23 responsibility. It's illegal activity, and
24 that's what we investigate.

25 Q. Do you believe that -- do you have a

1 view as to whether doctors who have written
2 prescriptions for prescription opioids have any
3 responsibility for the opioid problem in
4 Cuyahoga County?

5 MR. BADALA: Objection to form.

6 A. Do doctors have -- can you repeat
7 that, please?

8 Q. Yes.

9 Doctors who have written
10 prescriptions to patients for prescription
11 opioids, do they have any responsibility for the
12 opioid problem in Cuyahoga County?

13 MR. BADALA: Objection to form.

14 A. I don't know. I mean, I think
15 they're -- they have their patient's best
16 interest in mind. You know, they're just -- the
17 patient is asking for something and they're
18 helping them. Whether they know they're giving
19 them the medication, if it's becoming addictive,
20 one pill, 20 pills, I don't know. I don't know.

21 Q. Is there a drug abuse response team
22 within the sheriff's department?

23 A. I don't know if we've called our
24 detectives that are on call to respond to
25 overdoses, if that's another title we gave them.

1 That could be.

2 Q. If there was anything within the
3 sheriff's department --

4 A. Yeah. It would be within our
5 narcotic division, the detectives that I spoke
6 on.

7 Q. Okay. Have you had any -- any
8 friends or family members who have had addiction
9 to prescription opioids?

10 A. Will you repeat that, please?

11 Q. Yes.

12 Whether you -- any friends or family
13 members of yours have dealt with addiction to
14 prescription opioids.

15 A. I've had family members that have
16 died of overdoses.

17 Q. How many family members?

18 A. Two cousins.

19 Q. Are they -- live here in the
20 Cuyahoga County area?

21 A. One did; one did not.

22 Q. And when did they die?

23 A. The exact years, I don't know. It's
24 been a while.

25 Q. Sorry. Like in the -- roughly? In

1 the 2000s?

2 A. Yeah, it's been in the 2000s.

3 Q. Okay.

4 A. Roughly maybe seven to ten years.

5 Q. And what -- if I may ask, what did
6 they overdose on?

7 A. That, I don't know.

8 Q. Okay. Do you know whether any
9 arrests were made in connection with either of
10 the --

11 A. I never followed up with it. No.

12 Q. Any other personal connections to --

13 A. We've had members of our department,
14 a particular friend of mine, another deputy, his
15 daughter overdosed. It was not fatal. It was
16 non-fatal. But he -- discussions with him. He
17 went through a lot. And that journey began with
18 prescription medication as well.

19 Q. What did the daughter overdose on?

20 A. That, I don't remember.

21 Q. When was this?

22 A. Probably three, four years ago.

23 Q. Before I go to this one, forgive me
24 if I haven't asked you this -- forgive me if I
25 did ask you this before, but is there -- can you

1 think of any expenditures that the Cuyahoga
2 County Sheriff's Department has that are
3 directly and exclusively related to narcotics or
4 narcotics investigations?

5 MR. BADALA: Objection to form.

6 A. Well, we developed staffing for the
7 drop box pill program. That's something we've
8 never had before. I consider that an
9 expenditure; salary, hours, vehicles, mileage,
10 stuff like that. The two detectives on call to
11 respond to these overdoses, they have now in
12 their contract on-call pay, something they never
13 had before.

14 Q. Is that something the union
15 negotiated for them?

16 A. Absolutely, yes.

17 As well as the sergeants receive the
18 on-call pay.

19 Can you repeat it again? I'm sorry.
20 Expenditures I believe you said.

21 Q. Yes, that are sort of solely and
22 exclusively related to narcotics, narcotics
23 investigations.

24 A. Those would be a couple I can think
25 of offhand.

1 Q. Anything else?

2 A. I think I stated before, something
3 like equipment, special equipment maybe, type of
4 gloves or -- sometimes they go to these
5 overdoses, they put the full suit on, if there
6 is suspected fentanyl or something like that.
7 So I guess little expenditures like that would
8 add up. Vehicles. Like I said, for the guys on
9 call, they take home vehicles now, but -- I'm
10 sure I'm missing some things, but that's the
11 best I can think of right now.

12 Q. Are there any other departments
13 within the sheriff's -- any other groups within
14 the sheriff's department that are on call?

15 A. We have a sergeant in charge of
16 our -- it's a human trafficking task force.
17 He's on call.

18 Q. Anybody else?

19 A. That's receiving pay, no. That --
20 let me think real quick. We do have -- now I
21 put a sergeant on call for death -- or use of
22 force death investigations for the City of
23 Cleveland for taking over their investigations
24 if they use deadly force, so he's on call to
25 respond to that.

1 Q. Does he have a car or use a car for
2 that?

3 A. Yes, he does.

4 Q. Okay. And same for the human
5 trafficking person that is on call, do they have
6 a car?

7 A. They have one that's not a -- that's
8 not our expenditure. It's the Attorney
9 General's Office supplied those vehicles.

10 Q. Do you know whether the sheriff's
11 department has ever applied for any grants
12 related to narcotics -- narcotics
13 investigations?

14 MR. BADALA: Objection to form.

15 A. I don't remember any, no.

16 - - - - -

17 (Thereupon, Gerome Deposition
18 Exhibit 7, 2017-2018 Cuyahoga County
19 Strategic Plan Project List -
20 Community Safety and Protection, was
21 marked for purposes of
22 identification.)

23 - - - - -

24 Q. Gerome Exhibit 7 is a one-page
25 document entitled "2017 through 2018 Cuyahoga

1 County Strategic Plan Project List - Community
2 Safety and Protection." This was -- the Bates
3 number associated with this document, I'm not
4 sure why it didn't print out.

5 MR. BLOCK: Did you give them with
6 double sides?

7 MR. BADALA: Ours was not.

8 MR. BLOCK: I only wanted to ask
9 about the first page of it anyway.

10 MR. BADALA: I just want to let you
11 know his exhibit doesn't have it either.

12 Q. Okay. So I've got you the first
13 page of what was -- the Bates number associated
14 with this was 121911, CUYAH_121911.

15 MR. BADALA: It's probably a native.
16 That's probably why.

17 Q. And the question is whether you are
18 familiar with this document, Captain Gerome.

19 A. I don't remember reviewing this
20 document, no.

21 Q. Okay. Do you know who created it?

22 A. No, I do not.

23 Q. Then you can put that aside.

24 Anything you need to correct in
25 terms of your testimony of any of the questions

1 that I've asked you?

2 A. Not that I remember, no.

3 MR. BLOCK: Okay. I will pass the
4 baton to one of my colleagues here representing
5 one of the other parties in the case.

6 Thank you, sir, for your time.

7 THE WITNESS: Thank you.

8 EXAMINATION OF DONALD GEROME

9 BY MR. LONERGAN:

10 Q. Captain Gerome, I introduced myself
11 at the outset of your deposition, but I'll do it
12 again. I'm Sam Lonergan. I'm with the law firm
13 of Arnold & Porter, Kaye Scholer, and in this
14 litigation I represent two pharmaceutical
15 manufacturers, Endo and Par.

16 A. Okay.

17 Q. I'm going to do my best not to ask
18 any questions that are duplicative of what Ben
19 just asked you, but, frankly, you just were
20 asked and answered a lot of questions so I can't
21 make any guarantees.

22 To the best of your understanding,
23 are prescription opioids, which we've been
24 talking about today, approved for use by the
25 Food & Drug Administration?

1 MR. BADALA: Objection to form.

2 A. I don't know.

3 Q. Do you know whether prescription
4 opioids have a medically approved use?

5 MR. BADALA: Objection to form.

6 A. Can you repeat that, please?

7 Q. Sure. I'll ask a better question.

8 Do you know whether prescription
9 opioids have a medical use or medical uses that
10 have been approved by the FDA?

11 A. Wasn't that your first question? I
12 don't know that. I didn't know that one.

13 Q. Do you know why doctors prescribe
14 prescription opioids to patients?

15 MR. BADALA: Objection to form.

16 A. No, I don't know why they do.

17 Q. Have you ever heard of a doctor
18 prescribing a prescription opioid to a patient
19 post-surgery?

20 A. Yes.

21 Q. Which patient?

22 MR. BADALA: Objection to form.

23 A. If --

24 MR. BADALA: I can tell you not to
25 identify -- are you asking for the name of the

1 person that was prescribed?

2 MR. LONERGAN: I'm asking what he's
3 referring to.

4 MR. BADALA: I would just tell you
5 not to give the person's name. I mean, there's
6 HIPAA laws and that's why --

7 Q. Are you able to answer my question
8 without providing a person's name?

9 A. No, I'm not.

10 Q. Okay. Have you ever heard of a
11 situation where a doctor prescribed a
12 prescription opioid for a person with end-stage
13 cancer?

14 A. I don't know.

15 Q. Are you aware of that being an
16 approved medical use for prescription opioids?

17 MR. BADALA: Objection to form.

18 A. No, I don't know, sir.

19 Q. Would you agree that a physician
20 would be in the best position to make a
21 determination as to whether a patient should
22 receive a prescription opioid?

23 MR. BADALA: Objection to form.

24 A. Can you repeat that, please?

25 Q. Sure.

1 Do you agree that a physician would
2 be in the best position to make a determination
3 as to whether a patient should receive a
4 prescription opioid?

5 MR. BADALA: Objection to form.

6 A. Sir, I don't know that.

7 Q. Do you believe that a physician
8 would be in the best position to evaluate a
9 patient's medical needs?

10 MR. BADALA: Objection to form.

11 A. Yes, sir.

12 Q. And do you believe that a physician
13 would be in the best position to evaluate the
14 risks associated with prescribing a medication
15 to a patient?

16 MR. BADALA: Objection to form.

17 A. I don't know that, sir.

18 Q. Do you agree that prescription
19 opioids can be beneficial to a patient when used
20 properly?

21 MR. BADALA: Objection to form.

22 A. I don't know that, sir.

23 Q. You testified earlier today about
24 your belief about a connection between
25 prescription opioids and heroin and fentanyl

1 overdoses, correct?

2 A. Yes, sir.

3 Q. And I believe you testified that
4 your belief was based in large part on
5 conversations that you had had with certain
6 families. Do you recall that testimony?

7 A. I recall that as well as speaking to
8 some of the detectives that respond to these.

9 Q. With respect to the families that
10 you were talking to, which opioids or
11 prescription opioids were those people taking?

12 A. Sir, I don't know.

13 Q. With respect to any conversations
14 you've had with anybody concerning the
15 connection between prescription opioids and
16 heroin and fentanyl use, which prescription
17 opioids are you referring to?

18 MR. BADALA: Objection to form.

19 A. There's no specific that I'm
20 referring to.

21 Q. You just lump them all in one group
22 together?

23 MR. BADALA: Objection to form.

24 A. Yes, sir.

25 Q. With respect to the families that

1 you said -- you testified you spoke to about
2 prescription opioid use, why were the people
3 taking the prescription opioids?

4 A. I don't remember the conversation as
5 to if they explained that or not.

6 Q. Was it a situation where the patient
7 had been prescribed a prescription opioid and
8 was using it consistent with the doctor's orders
9 or was it a situation where the person had gone
10 out and obtained a prescription opioid through
11 some illicit means?

12 MR. BADALA: Objection to form.

13 A. Again, I don't remember the -- the
14 exact conversation I had with them.

15 Q. Is that answer that you don't know
16 the answer or you only remember certain aspects?

17 A. I mean, I remember some of the phone
18 calls. I don't remember all the phone calls. I
19 don't remember the specifics of us discussing if
20 it was prescribed medication or not prescribed
21 medication, so --

22 Q. And is that true with respect to all
23 the conversations you had with families
24 concerning prescription opioid uses?

25 A. Yes. Yes, sir.

1 Q. I believe you previously testified
2 that you had no recollection of your department
3 ever investigating a patient who was using a
4 prescription opioid in a manner that was
5 consistent with how it had been prescribed by a
6 doctor; is that correct?

7 A. That was a long question. Can you
8 please repeat that?

9 Q. I don't know if I can, actually.
10 I believe you previously testified
11 that you have no recollection of your department
12 investigating a patient who was using a
13 prescription opioid in a manner that was
14 consistent with the way it had been prescribed
15 by a doctor, correct?

16 MR. BADALA: Objection to form.

17 A. No, I'm not aware of that, if it
18 was -- if they were using it correctly, I don't
19 know why we would investigate that.

20 Q. Do you consider over-prescribing of
21 opioids by doctors to be a cause of heroin or
22 fentanyl use?

23 MR. BADALA: Objection to form.

24 A. I'm not familiar with them
25 over-prescribing medication. I've never

1 investigated a doctor for doing that.

2 Q. To the best of your knowledge, has
3 your department ever investigated any doctor for
4 over-prescribing prescription opioids?

5 A. No, sir, not that I'm aware of.

6 Q. Are you able to identify a single
7 script that -- strike that.

8 Are you able to identify any
9 instances where a doctor wrote a prescription
10 for an opioid to a Cuyahoga County resident that
11 was not medically necessary?

12 MR. BADALA: Objection to form.

13 A. Can you repeat that, sir? I don't
14 want to answer that incorrectly.

15 Q. You're putting me to the test.

16 A. I just want to get it right. That's
17 all.

18 Q. Are you able to identify a single
19 instance where a physician prescribed an opioid
20 to a Cuyahoga County resident and the
21 prescription was not medically necessary?

22 MR. BADALA: Objection to form.

23 A. No, I can't identify that. No.

24 Q. As a general matter, you understand
25 what a package insert or a warning label is for

1 any prescription drug, correct?

2 MR. BADALA: Objection to form.

3 A. Yes.

4 Q. Have you ever had cause to review or
5 look at a warning label for any prescription
6 opioid?

7 MR. BADALA: Objection to form.

8 A. No, I have not.

9 Q. Are you aware that the warning label
10 or package insert for prescription opioids
11 identify side effects associated with the use of
12 a prescription opioid?

13 MR. BADALA: Objection to form.

14 A. I'm not aware of what's on the
15 bottle, sir.

16 Q. Are you aware that the warning label
17 and package inserts for prescription opioids
18 identify addiction as a possible side effect for
19 the use of prescription opioids?

20 MR. BADALA: Objection to form.

21 A. No, sir, I didn't know that.

22 Q. Are you aware that the FDA approves
23 the language that's contained in the warning
24 labels and package inserts for prescription
25 opioids?

1 A. I'm not aware of that, sir.

2 MR. BADALA: Objection to form.

3 Q. Are you aware of any instance where
4 any physician prescribed any prescription opioid
5 to any Cuyahoga County resident where the
6 physician had not previously read the warning
7 label or package insert before prescribing the
8 drug?

9 A. No, I'm not aware of that instance.

10 Q. Are you aware of any instance where
11 any physician prescribed any prescription opioid
12 to any Cuyahoga County resident where the
13 physician did not understand the risks and
14 benefits of prescribing the opioid to the
15 patient?

16 MR. BADALA: Objection to form.

17 A. That, I don't know, sir.

18 Q. Have you or your department ever
19 investigated the sales practices of any
20 prescription opioid manufacturer?

21 A. As I stated before, I'm not aware of
22 us ever investigating that.

23 Q. I apologize if that was duplicative.

24 As you sit here today, do you have
25 any reason to believe that any opioid

1 manufacturer's sales representative ever made
2 any inaccurate or misleading statements to
3 physicians who prescribe opioids to patients?

4 MR. BADALA: Objection to form.

5 A. Can you repeat that, please, the
6 first part of that?

7 Q. Sure.

8 As you sit here today, do you have
9 any reason to believe that any sales
10 representative for an opioid manufacturer made
11 any inaccurate or misleading statements to a
12 physician who prescribes opioids?

13 MR. BADALA: Objection to form.

14 A. I'm not aware of that. No, sir.

15 Q. Are you aware of any instance where
16 a pharmaceutical sales representative for an
17 opioid manufacturer made a statement that was
18 inconsistent with the product's warning label or
19 package insert?

20 MR. BADALA: Objection to form.

21 A. I'm not aware of that, sir.

22 Q. Are you able to identify a single
23 doctor who ever prescribed a prescription opioid
24 to a Cuyahoga County resident who relied on a
25 sales representative's improper marketing as the

1 basis for prescribing a product to the Cuyahoga
2 County resident?

3 MR. BADALA: Objection to form.

4 A. I'm not aware of that.

5 Q. Sir, a few moments ago you
6 referenced personal -- your personal experiences
7 with prescription opioids, and I believe you
8 testified that two of your cousins had passed
9 away as a result of an overdose and one of your
10 friend's daughters; isn't that correct?

11 A. The friend's daughter did not pass
12 away. It was a non-fatal.

13 Q. Were your cousins' overdoses -- did
14 they overdose on prescription opioids?

15 A. Sir, I don't -- I didn't follow up
16 in how they overdosed.

17 Q. Do you know if your cousins' initial
18 use of opioids was through prescription opioids?

19 A. I don't know if I stated that they
20 took prescription or they were addicted to
21 opioids. I just stated that I know two people
22 that were -- who overdosed. I don't know what
23 it was from, so I don't know.

24 Q. And so, then, is it fair to say that
25 you don't know if your cousins had initially

1 started out using prescription opioids?

2 A. Yes, it's fair to say. I don't
3 know.

4 MR. LONERGAN: I told you I'd be
5 quick.

6 THE WITNESS: Thank you.

7 MR. LONERGAN: Thank you for your
8 time.

9 EXAMINATION OF DONALD GEROME

10 BY MR. MCLAUGHLIN:

11 Q. Captain Gerome, thanks for your
12 patience today. I only have a few questions for
13 you.

14 A. Sure.

15 Q. I introduced myself earlier. My
16 name is Chris McLaughlin. I represent Walmart.

17 Were you aware before today that the
18 county had sued Walmart as a part of this
19 litigation?

20 A. Not specifically Walmart, no.

21 Q. Do you have any personal knowledge
22 as to why the county sued Walmart?

23 A. No, I don't.

24 Q. Do you have any personal knowledge
25 as to why the county sued CVS, Rite-Aid and

1 Walgreens?

2 A. No, I don't.

3 Q. Can you personally point to any
4 specific conduct by Walmart, CVS, Rite-Aid or
5 Walgreens related to opioids that caused harm to
6 the county?

7 MR. BADALA: Objection to form.

8 A. No, sir, I can't.

9 Q. I believe you testified that as part
10 of your training for -- at the sheriff's office,
11 that you took some training on first aid and
12 trauma; is that right?

13 A. Yes, sir.

14 Q. Besides that training, do you have
15 any other medical training?

16 A. The first aid training, the trauma,
17 and then the -- I guess if you called -- the
18 Narcan training that I spoke of, if you want to
19 consider that medical training, that would
20 probably be it, too.

21 Q. And that's the web-based training
22 you took on the AG's website?

23 A. Yes, sir.

24 Q. Do you have any training or
25 expertise in toxicology?

1 A. No, sir.

2 Q. Do you have any training or
3 expertise in the diagnosis or treatment of
4 addiction or substance abuse?

5 A. No, sir.

6 Q. So you would not be qualified to say
7 one way or another whether somebody was addicted
8 to a substance or not, correct?

9 A. No, sir.

10 Q. That is correct?

11 A. No. Can you repeat that?

12 Q. Sure.

13 A. I'll try to answer it right.

14 Q. You would not be qualified to say --

15 A. No, I would not be qualified.

16 Q. -- one way or another as to whether
17 somebody was addicted to a substance, correct?

18 A. No, I wouldn't be qualified,
19 correct.

20 Q. Captain, you testified that
21 currently you are not an investigator; is that
22 right?

23 A. Correct.

24 Q. And when was the last time you
25 actually served in the role of an investigator,

1 where you were actively involved in
2 investigations?

3 A. It's -- with a concern to narcotics
4 investigations or any investigations?

5 Q. Narcotics.

6 A. Narcotics. As an investigator, it's
7 been a long time. I can't remember the last
8 time.

9 Q. More than ten years?

10 A. As a lead investigator, probably,
11 yes.

12 Q. And I believe you also testified
13 that you personally have never responded to a
14 drug overdose scene; is that right?

15 A. No, sir. I don't think I testified.
16 I have been to a scene before.

17 Q. How many times?

18 A. Once.

19 Q. And when was that?

20 A. When I first got into the unit
21 probably in 2014, when I became a lieutenant, I
22 responded to one.

23 Q. Were you the lead investigator?

24 A. No, I was not.

25 Q. Okay. Have you -- so have you ever

1 personally investigated the drug use history of
2 any overdose victim for which the sheriff's
3 office has responded to a scene?

4 A. No, I have not.

5 MR. McLAUGHLIN: I have no further
6 questions. Thank you, sir.

7 THE WITNESS: Thank you.

8 MR. BADALA: Anyone else in the
9 room? How about on the phone? Do you have any
10 questions on the phone? Is anyone even on the
11 phone?

12 Let's just take two minutes. Let me
13 see if I have anything.

14 THE VIDEOGRAPHER: Off the record,
15 2:34.

16 (Recess had.)

17 THE VIDEOGRAPHER: On the record,
18 2:38.

19 MR. BADALA: So I don't have any
20 further questions, or any questions at all.

21 MR. BLOCK: So I'll just say again,
22 on behalf of everyone here, thank you, Captain
23 Gerome, for your time. This concludes the
24 deposition, subject to, it does sound like
25 there's some additional documents that we think

1 should have been produced in advance. If we
2 get -- if additional documents are forthcoming
3 that we think there are questions on, I will
4 leave it open for the purposes of asking
5 questions about that -- those documents.

6 MR. BADALA: Yeah. Like I said a
7 few times, send us a letter with a request that
8 it applies to; we'll look at it, consider it and
9 we'll discuss it further.

10 MR. BLOCK: Thank you, sir.

11 THE VIDEOGRAPHER: Off the record,
12 2:39.

13

14 (Deposition concluded at 2:39 p.m.)

15 - - - - -

16

17

18

19

20

21

22

23

24

25

1 Whereupon, counsel was requested to give
2 instruction regarding the witness' review of
3 the transcript pursuant to the Civil Rules.
4

5 SIGNATURE:

6 Transcript review was requested pursuant to
7 the applicable Rules of Civil Procedure.
8

9 TRANSCRIPT DELIVERY:

10 Counsel was requested to give instruction
11 regarding delivery date of transcript.
12
13
14
15
16
17
18
19
20
21
22
23
24
25

REPORTER'S CERTIFICATE

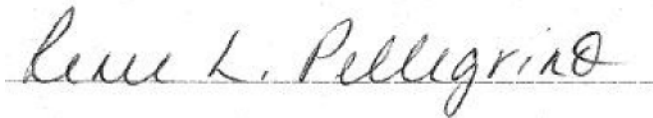
[illegible]

I, Renee L. Pellegrino, a Notary Public within and for the State of Ohio, duly commissioned and qualified, do hereby certify that the within named witness, DONALD GEROME, was by me first duly sworn to testify the truth, the whole truth and nothing but the truth in the cause aforesaid; that the testimony then given by the above referenced witness was by me reduced to stenotypy in the presence of said witness; afterwards transcribed, and that the foregoing is a true and correct transcription of the testimony so given by the above referenced witness.

I do further certify that this deposition was taken at the time and place in the foregoing caption specified and was completed without adjournment.

1 I do further certify that I am not a
2 relative, counsel or attorney for either party,
3 or otherwise interested in the event of this
4 action.

5 IN WITNESS WHEREOF, I have hereunto set
6 my hand and affixed my seal of office at
7 Cleveland, Ohio, on this 19th day of November, 2018.

8
9
10
11 
12

13 Renee L. Pellegrino, Notary Public
14 within and for the State of Ohio

15
16 My commission expires October 12, 2020.
17
18
19
20
21
22
23
24
25

Veritext Legal Solutions
1100 Superior Ave
Suite 1820
Cleveland, Ohio 44114
Phone: 216-523-1313

November 19, 2018

To: SALVATORE C. BADALA

Case Name: In Re: National Prescription Opiate Litigation v.

Veritext Reference Number: 3109191

Witness: Donald Gerome Deposition Date: 11/14/2018

Dear Sir/Madam:

The deposition transcript taken in the above-referenced matter, with the reading and signing having not been expressly waived, has been completed and is available for review and signature. Please call our office to make arrangements for a convenient location to accomplish this or if you prefer a certified transcript can be purchased.

If the errata is not returned within thirty days of your receipt of this letter, the reading and signing will be deemed waived.

Sincerely,
Production Department

NO NOTARY REQUIRED IN CA

DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 3109191

CASE NAME: In Re: National Prescription Opiate Litigation v.

DATE OF DEPOSITION: 11/14/2018

WITNESS' NAME: Donald Gerome

In accordance with the Rules of Civil
Procedure, I have read the entire transcript of
my testimony or it has been read to me.

I have made no changes to the testimony
as transcribed by the court reporter.

Date Donald Gerome

Sworn to and subscribed before me, a
Notary Public in and for the State and County,
the referenced witness did personally appear
and acknowledge that:

They have read the transcript;
They signed the foregoing Sworn
Statement; and
Their execution of this Statement is of
their free act and deed.

I have affixed my name and official seal

this _____ day of _____, 20____.

Notary Public

Commission Expiration Date

DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 3109191

CASE NAME: In Re: National Prescription Opiate Litigation v.

DATE OF DEPOSITION: 11/14/2018

WITNESS' NAME: Donald Gerome

In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me.

I have listed my changes on the attached Errata Sheet, listing page and line numbers as well as the reason(s) for the change(s).

I request that these changes be entered as part of the record of my testimony.

I have executed the Errata Sheet, as well as this Certificate, and request and authorize that both be appended to the transcript of my testimony and be incorporated therein.

Date

Donald Gerome

Sworn to and subscribed before me, a Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that:

They have read the transcript;
They have listed all of their corrections in the appended Errata Sheet;
They signed the foregoing Sworn Statement; and
Their execution of this Statement is of their free act and deed.

I have affixed my name and official seal
this _____ day of _____, 20____.

Notary Public

Commission Expiration Date

ASSIGNMENT NO: 11/14/2018

Commission Expiration Date

[& - 2017]

Page 1

&	118717 150:22	154 8:20	2
& 1:20 2:6,16 3:7 3:11,17 4:3 11:12 11:15,18,21 12:1,4 206:10,21 219:13 219:25	11:07 117:17 11:22 117:20 12 5:8 47:6 121:12 239:16 120708 164:18 120745 164:25 120760 164:18 12077 61:13 121 8:6 1211 3:18 1215 13:2 121572 168:25 121789 169:2 121804 169:1 121911 218:14,14 12:14 163:3 12:55 164:9 13 165:22,24 166:6 166:15 1300 1:21 131 8:7,7,8,8 132 8:9 135 8:9 139 8:10 14 1:15 7:3 150:23 173:16,19 141 8:10 142 8:11,11 145 8:12,12,13,13 146 8:14,14,15 147 8:15 148 8:16,16 149 8:17,17 14th 11:2 15 57:17 64:11 193:16 150 6:6 152 8:18 153 8:18,19,19,20	155 8:21,21 157 8:22 158 8:22,23 159 8:23,24 16 64:11 160 8:24,25 162 9:3,3 164 5:12 6:8 168 6:9 17 1:7 7:3 171:24 1701 4:4 171 6:11 1717 3:4 173 9:4 174 9:4 175 9:5,5 176 9:6 177 9:6,7 179 9:7 18 1:10 180 9:8 182 9:8 1820 240:2 183 9:9 185 6:13 189 9:9,10 19 240:4 191 9:10 19103 3:5 19103-2921 4:4 194 9:11 195 9:11,12 196 9:12,13 197 9:13,14 199 9:14 1995 18:6,9 1997 25:22 19th 239:7 1:50 210:18	2 5:3 6:6 150:5,19 184:18 190:2 20 57:18 193:16 212:20 241:16 242:22 243:22 200 9:15 2000 20:24 20001-4956 3:14 20005 3:9 2000s 14:18,20 214:1,2 2001 14:19 18:8,9 19:13 23:15 2005 20:24 24:10 37:19 38:3 39:4 40:16 47:5 170:16 197:16 198:15,23 2006 177:2 2007 20:1 28:1 31:13,19 37:19 2008 177:9 201 9:15 2010 30:3 2014 20:2 32:12 37:11 40:3,25 72:3 154:22 181:16 234:21 2015 6:8 164:4,16 165:20 166:16 2016 6:10 20:3 43:8 126:9,10 150:21 152:17 168:19,24 169:3 169:21 185:6,19 185:24 2017 6:12 61:12 125:19,20 126:15 169:24 171:12 172:23 173:19,21 176:11 217:25
0			
000118362 6:14 184:23 000118584 6:12 171:13 00018717 6:7 150:6 05 181:25 07 38:3 40:16 181:25			
1			
1 6:5 60:25 61:8 61:10 110:20 10017 2:4 10019-9710 2:18 10036-8704 3:19 103 7:23,23 107 7:24 108 7:24 10:02 71:18 10:16 71:21 11 30:4 11/14/2018 240:8 241:3 242:3 243:2 1100 240:1 111 7:25 112 8:3 113 8:3,4 114 8:4,5 116 8:5,6 118362 185:8 118584 171:25 118585 171:25			

[2017-2018 - access]

Page 2

2017-2018 6:15 217:18 2018 1:15 11:3 126:5 217:25 239:7 240:4 202 3:9,14 9:16 2020 239:16 203 9:16,17 204 9:17,18,18,19 205 9:19,20 206 9:20,21 207 9:21,22,22 208 9:23,23,24 209 9:24,25 10:3 21 7:4 210 10:3,4,4 211 10:5,5 212 2:18 3:19 10:6 10:6 215 3:5 4:5 10:7 216 2:9,13 216-523-1313 240:3 217 6:15 10:7 219 5:9 22 7:4 220 10:8,8,9,9 221 10:10,10 222 10:11,11,12,12 2222 2:8 2227 239:12 223 10:13,13 225 10:14,14 226 10:15,15 227 10:16,16,17,17 228 10:18,18 229 10:19,19,20 230 10:20 230-7676 2:4 231 5:10	232 10:21 238 5:14 24 7:5 24/7 96:3 25 7:5 250 2:17 26 7:6 2804 1:6,7 29y 190:3 2:06 210:21 2:34 235:15 2:38 235:18 2:39 236:12,14 3 3 6:8 164:3,14 30 167:19,20 190:9 3100 3:4 3109191 240:7 241:2 242:2 32 7:6 34 7:7 35 7:7 36 7:8 360 2:3 38 7:8 39 7:9 3rd 13:2 4 4 6:9 168:18,23 171:22 41 7:9,10 43 7:10 434-5421 3:9 44 7:11,11,12 166:22,24 44113 13:3 44113-1901 2:8 44114 240:2 44114-1190 2:13	45090 1:10 48 7:12,13 49 7:13 5 5 6:11 171:7,10,22 50 7:14 118:11 126:8 51 7:14 126:8 52 7:15,15 126:8 55 2:7 7:16 55th 2:17 56 7:16 58 118:9 586-3939 2:13 59 7:17 5th 150:21 185:6 6 6 5:4 6:13 184:22 185:5 61 6:5 63 185:8 64 7:17 66 7:18 167:9 169:16 662-2000 3:14 69 7:18,19 695-9000 3:19 7 7 5:5 6:15 178:15 178:20,21 217:18 217:24 70 7:19,20 125:20 719 150:22 725 3:8 73 7:20,21 125:21 75 169:13,14,16,17 169:18 77 167:15,15	8 8 178:24 179:1 80 34:14 82 7:21 836-8000 2:18 844 2:4 850 3:13 851-8100 3:5 861-0804 2:9
			9 90 7:22 901 2:12 90s 14:18 93 7:22 950 1:21 963-5000 4:5 9:01 1:16 11:2
			a a.m. 1:16 aaron 1:8 abdc 206:2 able 49:8 91:3 113:5 128:23 145:18 202:12 221:7 226:6,8,18 229:22 abolished 30:2,5 abreast 49:24 absolutely 82:17 215:16 abuse 144:25 145:3,10 149:17 154:8,11 156:10 194:18,18,21 212:21 233:4 academy 18:7,24 18:25 20:7,8,10,14 access 57:6,8,12 66:12,15,17 123:4 129:7,9 130:3,12

[access - anymore]

Page 3

130:24 131:8,12 134:14,17 137:3 141:11,14 199:20 accessed 144:4 accessible 123:7 124:22 accomplish 240:16 accomplishing 48:24 account 130:10 accounts 115:9 accrue 112:8 accurate 61:21 169:22 accurately 62:3 acknowledge 241:11 242:16 acronym 118:23 139:12 act 26:5 106:18 241:14 242:20 actavis 204:3,6 acting 120:19 action 37:23 111:24 150:13 151:4,9 239:4 active 56:22 125:13 189:19 actively 97:25 98:1 198:1,3 199:16 234:1 activity 26:14 31:15 32:2 68:6 105:23 137:13 145:22 147:11 211:8,23 actual 88:5 94:19 154:11 add 34:10 216:8 addicted 53:20 230:20 233:7,17	addiction 99:17 149:23 213:8,13 227:18 233:4 addictive 55:2 212:19 adding 47:10 122:24 addition 119:7 additional 235:25 236:2 address 12:25 51:7 121:21,21 122:12 140:12 143:4,5 addresses 50:25 adequate 46:25 48:6 adjournment 238:21 administration 219:25 administrative 16:16,17 advance 101:1 236:1 advantage 211:10 advertise 64:1 advise 15:23 141:19 advised 77:23 advising 79:14 advisory 108:21 109:1,8 111:20 affiliated 111:3 affixed 239:6 241:15 242:21 aforesaid 238:12 afternoon 5:12 95:24 164:11 afterward 101:4	ag's 232:22 age 12:10 79:16 agencies 58:6 68:19 76:9,21 83:5,7,25 112:9 140:14 agency 80:25 81:1 106:1 130:9 141:1 143:22 188:5 198:7,11 agenda 98:16 100:22,23 101:6 103:10 agendas 102:19 agent 59:20 60:10 60:12 180:24 ago 166:2 214:22 230:5 agree 195:21,25 196:8 202:3,8 211:16 221:19 222:1,18 ahead 101:17 102:19 103:11 173:7 aid 21:10 208:8,9 208:11 231:25 232:4,11,16 al 1:10 alarm 95:7 alcohol 149:13,17 alert 79:13,20 94:13,20,21,24 95:9 186:1,3,7,21 186:23 187:23 190:1 191:1,1 alerts 78:23 190:21,22 191:3 allergan 203:4,7 allocated 117:3	allocations 116:21 amber 95:9 americas 3:18 amerisourceberg... 3:2 205:24,25 206:5 ammunition 112:22 amount 28:24 128:17 146:20 animals 188:16 announcing 186:24 annual 6:8,10 164:4,16,16,20 165:13 168:9,19 168:24 169:24 170:2 anonymous 137:24 answer 34:12 54:23 94:3 113:14 124:15 136:17 145:6 148:24 156:5 158:1 159:4 186:15 196:9 221:7 224:15,16 226:14 233:13 answered 130:22 219:20 answers 112:10 anthony 67:1 anybody 12:6 15:3 47:16 52:7,12 89:6 98:14 104:12 106:20,23 161:10 179:21 184:9 216:18 223:14 anymore 110:16 155:19 198:20 200:3
--	---	---	---

[anytime - aware]

Page 4

anytime 115:9 anyway 218:9 apartment 92:2 apologize 179:25 228:23 app 138:2 appear 241:11 242:15 appearances 2:1 3:1 4:1 5:3 appears 128:12 appended 242:11 242:18 applicable 237:7 applicants 47:23 applied 24:16 217:11 applies 236:8 apply 13:9 24:18 187:10 appointments 23:19 appropriate 138:22 approved 55:12 219:24 220:4,10 221:16 approves 227:22 approximate 115:16 approximately 15:7 27:25 181:1 april 6:12 171:11 171:24 172:22 arch 3:4 arcos 130:16,24 area 18:18 64:20 66:5 104:25 105:1 105:9 137:21 140:8 144:22 213:20	areas 26:7,9,12 62:20 arnold 2:16 11:21 219:13 arnoldporter.com 2:19 arrangements 240:15 arrest 91:4 92:5 107:9 157:4 202:18 arrested 90:4,8,10 91:13,24 92:6 106:20,23 161:4 arresting 145:21 arrests 89:22 90:1 92:4,10,11 93:14 107:10 145:16 146:7 147:1 161:9 165:21,24 166:6,9 166:15,15 189:13 189:15 202:13,22 214:9 arrive 195:22 196:4,15 arriving 77:19 article 171:18 173:3,13 articles 195:10 ascertain 87:1 aside 153:5 218:23 asked 77:15 92:24 100:7,12,14 150:11 153:20 157:13,16,18 158:12 179:25 214:24 219:1,19 219:20 asking 17:19 85:21 96:5 126:3 153:3 157:4	174:10 212:17 220:25 221:2 236:4 aspects 224:16 assign 81:7 assigned 21:1 23:16 24:1,6 29:17 32:15,20 33:9 34:17 35:2 37:11 38:16 39:11 40:4 57:12,22,25 58:2,4,17,23 59:6 59:14 63:10,14,16 64:18,19,22,25 65:8,9,16 66:5,19 66:24 69:16,23 71:25 72:22 74:1 74:7,9 79:24 96:11 105:12 110:5,13,17,18 112:6 121:2 122:14,15 125:16 168:5 170:17 180:23 181:10,15 182:9 198:7 assignment 182:3 241:2 242:2 243:2 assignments 71:25 170:22 assist 182:18 assistance 58:6 68:21 81:1,3 assisted 68:19 assisting 68:15 76:23 associated 95:8 121:15 153:7 218:3,13 222:14 227:11 associates 89:6	association 30:19 assume 78:21 119:14 assuming 49:22 attached 242:7 attachment 191:22,24 attain 145:18 attend 98:13,18 102:7,15 108:5 attended 97:16 98:15 99:23 100:20 107:24 108:9,17 151:20 151:25 195:17 attention 183:5 attorney 15:5 21:13 154:14 193:15 217:8 239:2 attorney's 97:22 151:18 attorneys 14:25 54:13 august 121:11,13 150:20 152:16 authorize 242:11 automated 56:14 127:15 131:4 automation 130:18 available 26:7 50:17,18 182:20 198:9 240:13 ave 240:1 avenue 1:21 2:3,12 3:18 avoided 192:17 aware 50:13 52:25 55:17 57:7 73:4 73:18 79:4 82:8
--	--	---	---

[aware - believe]

Page 5

91:17 93:12,14,19 94:3,7,11 100:10 111:12 112:13 113:18 114:9,12 117:8 127:10 130:11,14 131:10 131:19 132:8,9 133:8 137:4,5 153:6 154:2 160:9 162:16,18 177:18 179:19,23,24 180:4 183:19 184:13,17 189:15 195:3,13 202:9,20 221:15 225:17 226:5 227:9,14,16 227:22 228:1,3,9 228:10,21 229:14 229:15,21 230:4 231:17 aye 12:7	198:23 background 86:3 91:22 134:7 158:8 backtrack 187:13 bad 39:25 badala 2:3 11:9,9 14:17 17:8 21:20 21:25 23:25 25:6 26:24 32:4 34:23 35:20 36:2,4 38:10 39:24 41:8 41:18 43:1 44:6 44:16,21 48:1,7,25 50:8 51:2 52:5,17 55:15 56:3 59:2 61:7 64:5 66:2 69:1,7 70:10,20 71:16 73:9,17 82:7 90:18 93:18 103:16,23 107:11 108:8 111:11 112:20 113:8,23 114:17,22 116:15 116:23 117:13 121:18 130:25 131:9,18,24 132:7 135:13 139:6 141:17 142:5,24 145:2,4,11,19 146:12,18,21 147:5 148:19,22 149:1,5 152:24 153:1,9,15,18 154:1 155:6,11 157:6,25 158:15 158:22 159:2,8 160:5,13 162:2,21 173:14 174:7 175:6,11 176:19 177:16,24 179:22 180:3 182:13	183:7 189:6 191:14 194:20 195:7,24 196:7,18 197:4,10 199:13 200:16 201:24 202:7 203:9,17 204:1,8,16,23 205:6,15 206:8,24 207:7,15,24 208:6 208:14,23 209:6 209:13,20 210:1,4 210:12,16 211:6 211:21 212:5,13 215:5 217:14 218:7,10,15 220:1 220:5,15,22,24 221:4,17,23 222:5 222:10,16,21 223:18,23 224:12 225:16,23 226:12 226:22 227:2,7,13 227:20 228:2,16 229:4,13,20 230:3 232:7 235:8,19 236:6 240:5 baggie 85:8 baggies 190:15 balance 115:16 banded 118:21 bar 190:9 based 53:22 85:3 89:22 134:20 149:6 182:23 187:21 198:17 223:4 232:21 basic 20:21 basically 18:25 21:12 23:5,20 35:8 47:18 54:12 63:15 81:15 127:23 128:10	142:12 188:16 basis 29:9 46:18 58:15 69:24 230:1 bates 6:6,12,13 61:13 150:6,22 164:17,24 168:25 171:12,25 184:23 185:7 218:2,13 bathroom 190:9 baton 219:4 batone 66:20 67:3 67:15 74:7 bblock 3:15 bears 150:21 164:17 168:25 185:7 becoming 155:1 212:19 began 214:17 beginning 6:6,12 6:13 148:9 150:5 171:12 184:22 behalf 2:2,11,15 3:2,7,11,16 4:2 11:15,19,21,24 12:1,5 96:22 151:21 235:22 belief 222:24 223:4 believe 17:3 27:8 31:24 36:20 41:10 43:8 64:21 65:6 77:6 100:6 106:3 108:4 124:5,19 125:20 128:15 129:21 137:8 140:22 142:12 155:3,4 174:3 186:18 194:4 200:5 205:2 211:25 215:20
b			
b 4:3 36:25 168:4 baby 206:12 back 16:24,25 20:24 28:9,14 30:2 31:11,12 37:17,17 38:1 41:23 47:5 53:19 53:25 67:2 71:23 72:1 89:19 109:2 112:2 114:20 119:19 121:14 122:18 126:22 127:4 141:3,7 143:18 146:6,6 147:17,23 154:17 155:14 160:15 170:16 181:25 185:19,23 191:2 197:16,19 198:8			

[believe - captains]

Page 6

222:7,12 223:3 225:1,10 228:25 229:9 230:7 232:9 234:12 bell 177:5,10 bells 151:8 ben 11:17 65:12 219:18 beneath 167:8 beneficial 222:19 benefits 228:14 benevolent 30:19 benjamin 3:12 best 16:8 44:23 110:4 201:10 212:15 216:11 219:17,22 221:20 222:2,8,13 226:2 better 115:5 220:7 big 25:2 45:18 64:10 bigger 34:3 birth 134:3 bit 31:9 48:2 101:10,12 133:25 140:15 144:19 158:3 173:22 174:24 blab 132:11 block 3:12 5:8 11:8,17,17 12:2,6 12:16 61:5 68:1 71:14,22 117:15 117:21 159:17 162:25 164:13 188:25 210:14,22 218:5,8 219:3 235:21 236:10 blocks 135:3 board 17:6 35:23 43:7 108:20,21	109:1,8 111:20 178:13,16,17 179:2,2,6,11,17 193:22,24 bockius 4:3 bodies 58:9,10 119:23 body 16:16 17:5 88:16,18,19 bonnette 138:20 booking 18:18 boot 20:6 bottle 190:18 227:15 bottles 70:8 bottom 61:12 164:25 165:9 185:12 bova 36:20,23 42:10,19,23 box 40:12 41:9 69:8,13,17,19 70:13 104:11 122:7 200:1 215:7 boxes 69:24 104:13 branch 180:10 break 71:15 117:14 159:18 163:1 174:25 186:8 210:15 brief 42:8 46:18 79:17 98:8 147:19 briefed 91:7 93:24 115:8,17 161:12 195:18 briefing 50:14 72:6 98:6,9 100:8 briefly 69:12 186:22	briefs 46:19 50:1 bring 98:20 bromadol 200:19 brought 40:13 87:18 99:9 183:4 bucks 210:8 budget 45:9,17,24 47:25 49:4 114:21 116:12,12,21,22 117:2,6,7 budgeted 116:9 building 97:17 160:16 162:12,18 buildings 23:18 160:16 bunch 150:21 165:19 185:7 bureau 38:21 burling 3:11 11:18 burn 104:22 business 12:25 162:12 185:19,23 busts 146:17 busy 35:21	194:9 212:24 215:10,12,18 216:9,14,17,21,24 217:5 240:14 called 12:10 21:14 23:21 40:12 69:19 75:14 77:14 83:24 96:13,17 104:24 107:19 109:7 110:21 111:20,24 115:11 124:4 127:13 129:2,14 130:16 135:20 137:25 150:13 200:19 206:2 212:23 232:17 calling 77:19 199:21 calls 137:24,24 224:18,18 cameras 49:9,10 camp 20:6 cancer 221:13 captain 12:24 13:7 19:20,25 20:3 30:22 31:2 32:24 32:25 33:8 36:9 37:2,4 39:15,17,17 42:5,14 43:10 44:11 45:14 46:13 61:14 62:10 68:1 71:23 77:6,14 108:5,17,17 111:16 117:22 150:10,24 164:14 185:3 210:23 218:18 219:10 231:11 233:20 235:22 captains 41:24
		c c 2:3 3:12 19:1,2 82:25 135:21 240:5 ca 240:25 cabalero 27:2 calendar 126:5 call 17:10 18:17 20:5 22:21 28:25 29:11 34:6 37:23 58:7,7 68:13,21 69:16 74:21 75:3 76:17 78:20 79:24 80:24 84:21 96:2 109:6 118:23 128:5 134:10 155:25 190:20	

[caption - cocaine]

Page 7

caption 238:20 car 217:1,1,6 caraballo 16:13 25:14,20 27:3,5 31:21 33:13 62:12 62:21 72:12 card 49:15 127:25 cardinal 3:7 12:1 203:11,15 care 101:24 career 20:18 24:20 32:1 43:23 107:14 107:15 144:24 carfentanil 188:10 188:11,13,22 189:4,14,16,20 194:25 carole 97:23 151:14 carry 48:6 128:20 193:6,9 cartel 195:14 cartels 58:21,25 59:7 195:18,20 case 1:7,10 32:5 52:4,9 56:22,25 59:9 98:7 119:8 119:25 120:15 121:3,6,11,12,16 121:19 122:13 123:5 139:25 143:13 161:1 187:17,17 219:5 240:6 241:3 242:3 cases 120:9 133:9 135:8 198:25 202:1 catch 162:4 catchall 35:11 68:14	categories 169:3 category 55:5,20 167:10 cause 155:4 158:18,19,24 225:21 227:4 238:11 caused 89:8 232:5 causes 148:7 158:17,20,25 causing 147:17 cch 129:2 ccsd 165:4 cell 85:9 89:1,2 cephalon 205:8,9 205:13 certain 26:6 79:8 79:21 81:11 98:18 112:9 121:21 128:17 135:2 202:18 211:7 223:5 224:16 certificate 5:14 238:1 242:11 certification 193:17,19 241:1 242:1 certified 12:13 21:15 128:4 129:8 129:11 240:16 certify 238:8,18 239:1 chain 75:24 79:14 105:14 150:19 185:5,13,16 186:20 chair 97:19 chaired 97:24 chance 151:1 172:1 173:2,9 200:3	change 36:13 153:23,24 154:2 197:11 242:8 243:3 changed 197:3 198:12 changes 40:7 197:6 241:7 242:7 242:9 channel 178:15,20 178:21,25 charge 31:18 34:1 35:19 44:7 59:19 59:20 60:10,13 68:8 75:18 94:4 94:12 109:21,25 110:15,25 115:12 115:19,21 170:10 171:3 172:9,25 216:15 charged 99:11 177:2 charges 29:19 160:20 chart 6:5 60:22 61:1,18 110:20 116:24 charter 104:21 check 85:17 110:8 120:2 135:3 137:10 141:14 checking 95:4 checklist 82:3,9 chief 16:2,4,5,6 39:16 42:4,6,15,17 42:18,20,21,24 45:19 47:14 54:9 54:10 77:2,14 100:5,8,8 108:4,16 chiefs 76:18,24	china 195:6,11 choice 196:11 chris 11:23 231:16 christopher 2:12 chronologically 121:17,20 circulate 172:19 circumstance 141:24 circumstances 91:6 citizens 105:23 city 17:5,6,9,13 77:4 78:6 118:14 216:22 citycenter 3:13 civil 12:12 237:3,7 241:5 242:5 civilians 98:17 clarified 173:20 classes 21:13 classified 30:23 cleveland 1:22 2:8 2:13 11:5 13:2,6 26:12 74:18 75:5 98:12 106:3 118:14,14 129:21 129:25 130:1,7,13 216:23 239:7 240:2 climb 58:20 clinics 177:3 close 25:9 208:17 closure 147:21,25 156:1,22,24 157:3 157:10 clr 1:25 commclaughlin 2:14 cocaine 26:18 106:12 107:2,8,14
--	--	--	---

[cocaine - correct]

Page 8

201:1 cocktail 82:19 code 187:5 colleagues 219:4 collect 81:16 collected 70:1 83:21 88:24 121:15 collecting 138:5 collects 88:16 college 18:1 19:5 column 126:17 combination 153:17 combinations 152:20,23 153:8 come 24:13 29:8 42:25 43:6 45:13 50:18 68:6 70:22 89:19 99:10 112:2 116:5 118:21 119:1 124:14 127:4 138:11 148:18 154:14 158:10 172:7 184:7 190:16 193:21 196:22,23 202:2 comes 49:2 50:4 86:16 88:16 94:14 94:21 95:13 128:11 132:10 166:14 167:2 169:9 178:4 186:1 187:7 189:10 coming 46:21 49:18 77:16 78:5 96:23 138:6 149:7 162:15 177:18 188:24 189:5 195:6,11 197:2,20	211:11 commander 75:9 75:11 76:3 comment 122:16 189:18 commenting 186:7 188:9 comments 122:20 commission 239:16 241:19 242:25 243:25 commissioned 238:8 committed 177:9 committee 111:25 150:14 151:4,9,12 151:14 common 123:3 201:4 communicated 156:23 communication 65:22 66:3 182:15 communications 76:25 111:13 community 6:16 19:5 118:25 217:20 218:1 companies 2:16 53:12 company 104:23 205:10 206:11,18 compare 130:7 complaint 54:1 180:15 complaints 26:5,6 105:22 complete 116:6 completed 238:20 240:13	completely 197:13 computer 21:15 52:11,13,20 123:20 conceal 128:20 concern 234:3 concerned 195:9 concerning 223:14 224:24 concluded 236:14 concludes 235:23 condition 200:14 conduct 64:7 73:3 73:7,15 148:11 149:7 232:4 conducted 37:25 53:22 167:12 conducting 76:22 77:16 145:22 confused 109:6,10 confusing 136:25 congratulations 28:13 connection 52:3 114:15 123:24 134:18 135:16 161:4 214:9 222:24 223:15 connections 214:12 connolly 3:7 12:1 consider 85:2 122:5 145:9 215:8 225:20 232:19 236:8 considered 85:1 85:11 192:25 consistent 224:8 225:5,14 consolidated 130:19	constant 66:3 182:15 constraints 47:25 cont'd 3:1 4:1 8:1 9:1 10:1 contact 65:20 67:9 68:6 72:22 142:7 contacting 89:3 contain 52:15 contained 227:23 content 172:10 continued 164:12 continuous 21:8 21:11 contract 215:12 contribute 174:6 convenient 240:15 conversation 78:2 157:21,24 158:6,9 176:2,7,10 224:4 224:14 conversations 44:22 47:14 60:6 76:18,25 174:25 175:4,18 176:11 176:14,18,23 198:17 223:5,13 224:23 cool 38:22 coordinating 142:3 coordination 111:5 copy 123:21 172:14,17 191:6 corner 26:15 61:13 corporation 3:2 3:11 11:19 correct 22:22 30:24 64:21 71:11
---	--	---	--

[correct - cuyahoga]

Page 9

74:10 86:23 132:17 157:16 188:5 208:17 218:24 223:1 225:6,15 227:1 230:10 233:8,10 233:17,19,23 238:16 correction 18:6 corrections 18:10 18:14 21:22 22:3 242:17 correctly 55:11 158:19 166:23 170:18 171:5 225:18 council 17:6,10,13 17:15,19 counsel 11:6,15 237:1,10 239:2 count 74:6,13 counterfeit 201:19 counterpart 75:5 75:8 county 1:9 2:2 6:5 6:8,9,11,15 11:13 11:16 12:24 17:5 17:6,10,14,15,19 19:5 22:4,7 23:18 35:9 40:11 41:25 43:4 53:11 54:6 59:1 60:25 61:11 68:21 69:18 79:7 83:5,11 90:6 94:15 96:17,23 108:20 109:4,7 113:20 116:10 125:25 136:5 145:1,10 148:17 148:21 152:3 153:25 154:5,7,15	155:5 160:16 162:19 164:3,15 168:18,24 171:10 171:23 179:21 186:12 187:20 194:19 195:5,15 195:22 196:5,16 197:2,9,15 198:4 198:15 199:10 201:2 203:8,16,25 204:7,15,22 205:5 205:14,22 206:7 206:23 207:6,14 207:23 208:5,13 208:22 209:5,12 209:19,25 210:11 211:1,4,5,20 212:4 212:12 213:20 215:2 217:18 218:1 226:10,20 228:5,12 229:24 230:2 231:18,22 231:25 232:6 238:4 241:10 242:15 couple 14:1 29:24 32:19 37:3 43:8 58:9 60:14 62:6 63:10 65:16 96:25 97:17 98:13 100:6 109:23 111:17 118:16 136:8 166:2 176:21 194:12 215:24 course 21:4,8,17 57:16 164:22 185:18,23 courses 20:19 21:6 21:18 court 1:1 5:16 13:9,18 14:4,10	16:15 108:20 109:3,4,7,10,14,19 110:1,13,19,24 111:1,6,7,15,19 241:7 courthouse 70:24 courtroom 99:11 courtrooms 109:24,25 courts 22:19 32:19 34:7 109:22 110:15,18 181:11 181:12,12 cousins 213:18 230:8,13,17,25 cov.com 3:15,15 cover 103:14 covered 71:2 covington 3:11 11:18 craving 155:21 156:14,16 198:19 211:12 create 143:25 created 66:6 143:20 211:9 218:21 creates 130:9 creative 202:4,8 credit 49:14 crime 83:24 84:1,6 84:25 85:1 86:7 107:20 120:16 121:25 127:6 128:24 137:8,17 137:19 138:10 142:14 178:4 criminal 129:2 cris 135:21 136:22 crisis 53:12,15 54:23	crucial 85:8 current 19:18 currently 30:12 37:4 67:13 105:4 110:11 189:19 233:21 curtail 38:4 147:12 custody 5:16 cut 21:3 cuyah 6:7,12,14 61:13 150:6,22 164:17 168:25 171:13,25 184:23 185:8 218:14 cuyahoga 1:9 2:2 6:5,8,9,11,15 11:12,16 12:23 19:5 22:7 41:25 59:1 60:25 61:11 79:7 83:5,11 90:6 96:17,23 108:20 113:20 135:21 136:5 145:1,10 148:17,20 153:25 154:5,6 155:5 162:19 164:3,15 168:18,23 171:10 171:23 179:21 180:1 186:12 194:19 195:5,15 197:2,9,15 198:15 199:9 201:2 203:8 203:16,25 204:7 204:15,22 205:5 205:14,22 206:7 206:23 207:6,14 207:23 208:5,13 208:22 209:5,12 209:19,25 210:11 211:1,4,5,20 212:4
--	--	---	--

212:12 213:20 215:1 217:18,25 226:10,20 228:5 228:12 229:24 230:1 238:4 cuyahogacounty... 51:9 cvs 208:1,2,3 231:25 232:4 cyclopropylfent... 200:23	243:20,25 dated 6:11 171:11 dates 107:16 176:12 daughter 156:3 157:15 214:15,19 230:11 daughters 230:10 dawn 192:16,17 192:20 day 2:11 11:24 20:22 22:12 46:22 46:22 49:23,23 58:15,15,16 95:22 103:7 120:13 139:4 203:22 239:7 241:16 242:22 243:22 days 85:11 240:19 dea 20:21 21:4,17 57:12,22 58:1,4 59:6,11,16 60:4,10 60:12 64:18 65:9 98:14 105:4,5 132:3,16,24 161:15 178:10 180:17,20,20 181:14,19,21 182:4,9,24 183:4 184:8 195:17 197:22 198:10 dea's 58:12 dead 156:4 190:8 deadly 152:19,22 216:24 deal 13:25 66:22 73:14 105:17 dealer 89:14 dealers 26:14 211:13,17	dealing 35:17 59:7 86:10 deals 132:1 137:22 138:13 dealt 23:17 26:17 56:5 143:18 213:13 dear 240:10 death 216:21,22 deaths 192:17 deceased 53:19 80:19 91:11 decendent 86:2 149:12 decendent's 122:13 december 83:19 decided 95:18 deconflict 140:7 deconflicting 74:21,25 142:12 142:15 deconfliction 66:7 140:5 decreasing 153:13 deed 241:14 242:20 deemed 240:21 defendants 11:22 definition 54:25 delegated 46:23 49:22 62:20 delivery 237:9,11 dent 144:1 department 6:5,8 6:10,11 12:24 16:18 18:4 21:2,9 22:7,8 24:15 25:21 27:10,21 29:7 33:1,5 37:5 41:25 43:3,5,19,22 44:14 45:8,23	46:1,7,9 47:6 51:14,18 53:18 57:3,5,8 58:5,8,10 59:11 60:21 61:1 61:11,19,22 62:4 62:10 63:21 65:23 66:12 68:14,24 70:18 71:5 73:1 73:14,20 74:15,17 74:18 75:6 76:10 77:7,21 78:5 79:4 79:11 80:9 83:16 89:22 90:9 91:3 92:3,9 93:10,15,21 94:24 95:15,20 96:20,23 100:1,17 101:13,15 102:3 103:21 106:4 107:23 108:2,13 110:12 112:4,6,14 112:16 113:3,20 113:21 114:7,13 114:21 115:4 116:3,7,13,20,22 117:6 118:1,6,17 118:17,19 122:3 122:22 123:4,8 125:4,25 126:4 127:18 129:6,7,16 130:1,6,12,23 131:8,12,17,22,25 134:13 135:6,15 136:13,15 137:3 137:12,18 138:5 138:13,14 139:20 142:16 143:24 144:9,21 159:25 160:21,23 161:3,9 162:11 164:4,16 164:20 168:19,24 170:9 171:11,24
d			
d 65:11 d.c. 3:9,14 31:7 daily 29:8 45:12 46:18 50:2 65:19 69:24 dan 1:8 data 127:15 128:5 131:8,16 136:19 169:8 201:10 database 56:19 57:6,10 66:7,9,13 75:1 83:23 84:3 86:7 121:25 122:1 122:6 127:22 129:22 130:16,24 131:3,13 134:1 137:3,9 140:1,5,18 141:10,14 142:25 143:6,16,25 144:10,15 databases 84:5 122:2 127:7 136:18 date 11:2 44:1 61:12 80:12 122:13 134:3 181:17 237:11 240:8 241:3,9,19 242:3,13,25			

172:16,20 174:10 174:19 177:13,20 179:10,16 180:2 180:10,10 181:7 181:22 182:23 183:9,17 184:2,10 186:3 188:2 189:3 189:13,21 191:11 192:5,8,25 193:6 193:11,12,20,25 194:6,7 195:19 201:17,18 202:10 202:11,14 212:22 213:3 214:13 215:2 216:14 217:11 225:2,11 226:3 228:18 240:24 department's 45:8 116:4 departments 83:9 143:22 216:12 depending 96:1 120:18 depends 22:11 88:24 95:11 178:2 depict 62:4 deposed 12:13 deposit 115:10,10 deposition 1:13 13:15 14:22 15:22 54:14 60:24 150:4 164:2 168:17 171:9 184:21 217:17 219:11 235:24 236:14 238:19 240:8,11 241:1,3 242:1,3 deputies 29:12 34:15 57:25 69:23 110:4,12,17 128:3	129:8 142:22 deputy 16:4,5,6 18:8 19:17,21,24 23:14,24 25:17,24 25:25 27:23 30:3 39:4,7,7 42:3,4,6 42:17,18,25 64:18 64:22,25 67:2,4,7 67:15,15,19 96:10 108:12,16 109:23 141:6 167:24 168:3 181:4,6 197:16 214:14 describe 20:16 45:11 46:12 59:18 69:12 109:18 150:16 describing 80:17 187:24 description 6:3 55:10 61:21 designed 201:23 destroy 70:3 105:7 destroyed 104:19 detected 152:18 detection 63:16 detective 14:5 38:16,18,21,22,25 39:5 58:2 64:22 74:7 81:4 84:11 86:25 87:14 88:4 105:12 122:23,25 138:19 140:25 144:16 145:14 146:8 166:11,12 168:5 169:11 170:17 180:21,22 181:2,4 detectives 29:16 40:10 44:24 47:4 48:14,17,22 64:9	66:5 73:25 74:9 75:2 76:19 77:19 78:7,24 79:20,23 80:4 81:7,13 82:4 82:14 84:9,18,20 84:23 87:16,24 88:2 90:10 95:21 95:23,25 119:13 121:10 122:14 123:14,15 127:11 140:6 141:11 143:15 153:11 155:12,23 175:21 180:21 186:23 187:15 188:2 192:7 199:15 212:24 213:5 215:10 223:8 determination 221:21 222:2 developed 215:6 devices 49:12 devlin 115:21 dgerome 51:9 diagnosis 233:3 die 213:22 died 158:9 213:16 different 38:19 39:8 75:13 95:23 96:14 119:25 121:3 146:16 148:2 152:2,6 174:9 196:22 210:24 difficult 195:23 196:5,16 direct 62:22 133:12 170:20 directed 177:23 178:5	directly 63:2 76:3 215:3 director 71:3,4,6,9 disagree 195:21 195:25 196:9,19 disciplinary 16:20 discipline 16:22 discuss 45:19 75:20 236:9 discussed 77:7 99:7 103:22 104:3 107:25 151:16 177:17 178:9 discussing 97:1 224:19 discussion 69:2 discussions 60:4 98:22 99:20 214:16 dispatch 128:6 dispatchers 129:10 dispensary 71:7 disposal 104:24 dispose 105:3 distribute 193:8 193:18 202:6 distributed 198:22 distributing 177:15 distribution 185:10 189:14,20 192:23 distributor 91:21 184:11 distributors 94:6 district 1:1,2 diversion 159:21 dividing 118:5 division 1:3 21:2 23:17 24:7,8,20
---	--	---	--

[division - earlier]

Page 12

25:1,2,18 26:1 27:24 28:6,9,23 29:10,23 31:13,19 32:18,18,19,21 33:10 34:18,19 35:2 37:8,12,14,18 37:20 38:2,22 39:3,12,13 40:3,6 40:20,24 43:14 44:3,4 46:14 47:1 47:9,11 48:5,14,23 49:25 50:13 63:19 66:17,23 72:2,7,9 73:23 74:1,5,9 81:5 105:13 109:22 111:3,7,9 116:17 117:3,5,9 117:24 119:10 123:9 124:18 133:3 134:17 138:10 144:17 145:15,17 147:10 148:8 154:18 168:10 170:20 171:3 181:11,12 182:1,3,11 202:23 213:5 divisions 34:7 116:25 128:1 doctor 91:16 132:21 152:14 161:5,10 177:8 199:12 200:5,13 220:17 221:11 225:6,15 226:1,3,9 229:23 doctor's 160:3 224:8 doctors 178:18 212:1,6,9 220:13 225:21	document 1:8 61:10,17 73:6 82:8 164:15 171:23 217:25 218:3,18,20 documentation 124:20 documented 82:22 documents 15:8 15:10,14,16 52:4,9 52:15,25 73:13 123:25 235:25 236:2,5 dogs 63:10 doing 26:22 28:14 38:6 40:21,24 45:24 49:25 50:7 50:14 58:14,16 59:21,22,25 61:6,8 65:18 67:6,17 68:23 72:9 84:19 85:17 123:5 130:8 135:17 142:19,21 143:9,23 175:21 181:9 194:16 226:1 domestic 135:8 don 32:24 donald 1:13 5:7 12:10,15,19 164:12 219:8 231:9 238:9 240:8 241:4,9 242:4,13 243:20 donna 46:2 113:15 113:16,16 door 29:13 dose 141:4 double 141:14 218:6	doug 58:2 180:22 180:23 downtown 26:11 26:11 dozen 25:8,9 34:22 dr 177:2 186:7,10 186:11 188:9 189:23 201:15 drive 123:20,22,24 driver's 127:24 128:12 134:5 driving 128:11,13 134:6,7 drop 40:12 41:9 69:8,13,17,19,20 69:24 70:13 104:11,13 122:7 200:1 215:7 dropped 70:4 drug 3:2 13:25 26:6,14 38:4 41:13,15 44:14,15 44:20 49:13 55:2 55:23 58:21,25 59:7 62:25 63:15 64:4,19,20 68:6 77:17 79:10,15 85:10,25 89:14 92:5,6,11 99:16 105:9,23 106:6 108:20 109:3,4,7,9 109:14,19 110:1 110:13 111:15,19 114:6,15 122:8,9 126:19 128:24 135:17,17 144:25 145:3,9 146:16 147:24 149:17 155:20 190:10,12 195:14,20 211:13 211:17 212:21	219:25 227:1 228:8 234:14 235:1 drugs 26:16 41:16 55:4 56:6 79:18 81:25 85:4 93:4 106:6,8 126:19 146:20 148:2 149:9 155:19 156:16 157:10,19 196:22,23 197:2,5 197:7,7 211:17,18 dual 170:22 due 156:4 duly 12:12 238:7 238:10 duplicating 65:24 duplicative 219:18 228:23 duty 84:22 95:21 dying 80:22 e e 6:6,13 12:20,20 15:18 50:19,22,25 51:7,22 75:13,23 75:24 76:2,7,17 79:14 94:25 95:1 95:4,17 115:13 133:19 137:23 138:21 150:5,18 150:19,23 152:8 152:16 170:2,3 174:9 184:22 185:5,12,16,17,22 186:4,20 188:8 191:20,21,23 192:1,14 earlier 73:24 93:4 131:3 134:9 150:12 151:23 178:9 187:24
--	--	---	---

[earlier - expert]

Page 13

222:23 231:15 early 14:20 easier 118:7,8 east 118:21 eastern 1:3 edelman 67:1,20 effect 227:18 effective 48:23 effects 227:11 efforts 65:25 142:4 144:22 either 41:22 50:17 64:1 70:23 76:4 76:16 77:3 99:11 105:22 108:12 118:3 122:16 135:20 145:17 152:5 161:22 182:12 214:9 218:11 239:2 elaborate 158:3 electronic 21:14 83:3 electronically 137:20 elm 121:10,12 elyria 104:25 employees 73:19 encompassed 63:6 64:15 167:10 encountered 59:3 201:19 endo 2:15,15 11:22 208:25 209:1,4 219:15 ends 80:22 86:18 enforcement 14:6 14:11,19 18:22 19:13 20:4,13 35:12 38:4 44:15 56:21 64:23 68:19	70:21 76:9 85:17 102:9,11,14,17,23 103:25 104:1,6 106:17 107:16 115:11 117:5 127:14,14,25 129:15 133:18 135:6 139:9 140:14 141:18 144:24 enjoy 37:19 enter 140:9,11,11 140:12 160:15 entered 121:22 143:6 242:9 entering 64:8 70:24 enterprise 136:19 enters 38:11 entire 116:22 241:5 242:5 entities 210:24 entitled 61:11 164:15 171:18,23 217:25 eopata 134:10 eopota 21:14 epidemic 97:3 143:19 154:16 155:5,9 156:9,11 171:19 173:3 203:8 equal 35:23 equipment 17:16 45:19 46:16 112:22,23 115:24 216:3,3 errata 240:19 242:7,10,18 243:1 erroneous 173:13 173:15	errors 174:1,4 especially 149:19 esq 2:3,6,7,12,17 3:3,8,12,12,18 4:3 et 1:10 ethel 28:21 euclid 17:24 eugene 43:17 evaluate 222:8,13 event 76:5 239:3 events 15:11 98:9 98:10 everybody 123:8 everyday 37:24 107:20 evidence 35:15 69:15,16 70:2 81:16 85:7,11 88:17 91:9 115:12 115:22 122:17 170:21 173:1 exact 14:9 25:4 27:17 28:24 37:3 41:5 44:1 46:6 53:5 56:10 80:12 83:10 91:5 181:16 213:23 224:14 exactly 70:6 86:12 89:19 149:15 examination 5:7 12:11,15 164:12 219:8 231:9 examiner 41:23 75:25 79:12,12 86:15 88:16,18 94:15,18 119:24 186:11,14,16 187:17 191:7,8,11 191:12 201:7,12 examiner's 89:18 122:18 127:3	152:13 191:17 examiners 187:8 example 22:2 50:16 55:16 132:5 135:7 examples 49:6 exciting 37:25 excluding 93:6 exclusively 215:3 215:22 excuse 17:15 203:2 executed 29:21 242:10 execution 241:14 242:19 executive 154:15 exhausted 96:12 exhibit 5:16 6:5,6 6:8,9,11,13,15 60:25 110:20 150:5,18 164:3,14 168:18,23 171:10 173:10 184:22 185:5 217:18,24 218:11 exhibits 5:4 6:1 exist 124:16 existence 137:10 expand 24:20 expect 190:19 expected 103:13 expenditure 215:9 217:8 expenditures 45:18 112:17 215:1,20 216:7 experience 190:12 experiences 230:6 expert 144:9,11,12
--	---	---	--

[expertise - follow]

Page 14

expertise 232:25 233:3	206:14 207:1 208:8,10,18	152:20,23 153:8 153:17 155:20	143:2,14 144:23 150:23 152:8
expiration 241:19 242:25 243:25	218:18 225:24	156:16 159:11,12 159:15 188:15	173:20 189:23 192:23 193:1
expired 190:9	families 147:20 148:13 223:6,9,25	194:18,21 195:4 195:11 198:25	218:9,12 220:11 229:6 232:11,16
expires 239:16	224:23	201:1 211:3 216:6 222:25 223:16	234:20 238:10
explain 140:15	family 53:23 81:19 85:18 120:5,6	225:22	firsthand 113:24 174:23 195:8
explained 77:18 224:5	149:20 156:18,23 156:25 157:12,17	ferraro 1:20	199:14
explaining 186:1	157:22 158:6,7,12	festival 68:16	fiscal 45:22,23 46:1,7 113:15
explorer 140:1	160:12 175:1	fgallucci 2:9	117:4
expressly 240:13	213:8,12,15,17	field 84:18 122:20 126:18 145:24	five 117:14 175:13 175:14
extent 200:11	far 32:10 44:17 65:6 77:15,19	167:11	fleming 4:3
f	104:16 107:13 112:12 126:6	fighting 171:19 173:3	flights 116:1
face 72:18,18 75:15	136:2 154:14 158:10 194:15	figure 30:21 115:3 118:4 123:12	flip 33:20
facilities 23:20	195:9,19	125:21 132:18 138:15 143:8	floor 190:9
facility 22:10,15 22:24	fatal 80:24 140:22 141:4 214:15,16	189:4 202:11,13	flopped 33:20
facing 53:13,15 145:1	230:12	file 29:18 84:10 88:1 120:15 124:3	flows 105:14
fact 90:3 201:21	fatalities 192:1	filling 62:18	focus 40:7 148:7 164:23
fair 109:11 154:4 230:24 231:2	fatality 80:16	financial 117:11	focused 21:18 39:22 106:7
fall 63:5 180:12	fbi 195:17 198:10	find 81:24 91:3 119:19 156:15	171:17
falling 72:7	fda 55:12 201:22 220:10 227:22	185:9 189:8	focusing 62:8 141:15
falls 62:9 65:7 69:9,14	federal 12:11 97:17 114:10	finding 89:13	folders 84:10 127:11
familiar 91:5 96:13,16 105:1	197:22 198:10 209:22,23	fine 19:4	folks 34:8 47:10 49:24 50:13 66:16
107:18 129:20	feed 135:10	finish 101:15 176:5	73:23 74:6 84:7
130:15,20 133:21	feeds 144:4	finished 96:5 158:1	92:9 112:3 118:6
134:21,23 135:22	feel 33:25 86:10	firm 219:12	119:14,19 134:16
136:2,5,16,20	feldman 177:2	first 12:12 14:3,15 21:9 25:1 28:20	135:14 141:13
139:8,15,25	felt 110:4	32:17 79:3 80:8	149:10 175:24
159:23 161:5,16	female 190:6	97:11 103:8	182:8 195:5
172:4 190:20	fentanyl 55:6 90:5 90:15,16,19,22,23	119:23 128:10	follow 80:6 119:20 120:7 133:14
191:5 201:25	107:6 148:9,25		175:20 186:9
203:11,13,19,22			
204:25 205:8,11			
205:17,24 206:11			

[follow - general]

Page 15

230:15 followed 78:18 214:11 following 87:6 165:21 166:22 178:18 195:21 follows 12:14 food 219:25 football 64:2 force 16:21 31:7 57:11,21 59:7,11 59:25 63:15 64:20 64:24 65:5,23 66:6 67:6 68:3 74:10,12 92:25 96:7,17 97:4,12,20 98:23 99:21 100:3 100:9,18 105:9,16 106:2,7 112:8,18 112:19 118:22 132:3,15 142:19 142:20 148:5 152:3 161:15 170:18 178:10 180:16,17 181:14 182:9 183:4 216:16,22,24 force's 183:5 forces 58:7 64:13 64:16 65:7 96:7 96:11 112:6,13 113:5 144:17 199:18 foregoing 238:15 238:20 241:13 242:18 forfeiture 113:6 115:10,22 forfeitures 114:20 115:1,6,13	forgeries 180:2 forget 15:4 forging 160:8 forgive 214:23,24 form 14:17 17:8 21:20,25 23:25 24:24 25:6 26:24 32:4 34:23 35:20 36:2 38:10 39:24 41:8,18 43:1 44:6 44:16,21 48:1,7,25 50:8 51:2 52:5,17 55:15 56:3 59:2 64:5 66:2 69:1,7 70:10,20 73:9,17 82:7,19 90:18,23 93:18 103:16,23 107:11 108:8 111:11 112:20 113:8,23 114:17 114:22 116:15,23 121:18 124:19,20 130:25 131:9,18 131:24 132:7 135:13 139:6 141:17 142:5,24 145:2,11,19 146:12,18 147:5 148:19 149:1,5 152:24 153:1,9,18 154:1 155:6,11 157:6 158:15,22 159:2,8 160:5,13 162:2,21 173:14 174:7 175:6,11 176:19 177:16,24 179:22 180:3 182:13 183:7 188:14,25 189:6 191:14 194:20 195:7,24 196:7,18	196:21 197:4,10 199:13 200:16 201:24 202:7 203:9,17 204:1,8 204:16,23 205:6 205:15 206:8,24 207:7,15,24 208:6 208:14,23 209:6 209:13,20 210:1,4 210:12 211:6,21 212:5,13 215:5 217:14 220:1,5,15 220:22 221:17,23 222:5,10,16,21 223:18,23 224:12 225:16,23 226:12 226:22 227:2,7,13 227:20 228:2,16 229:4,13,20 230:3 232:7 format 50:3 137:17 forms 196:22 forthcoming 236:2 forward 146:24,25 192:7 forwarded 174:13 178:9 found 84:7 85:3,16 120:3 161:1 190:8 190:8,24 four 185:11 214:22 fox 178:23,24 frame 22:14 40:16 181:25 frank 2:6 11:11 15:2 frankly 219:19 free 61:9 194:4 241:14 242:20	frequency 153:13 200:11 frequent 201:5 frequently 95:4 friend 31:6 214:14 friend's 230:10,11 friends 81:19 160:12 213:8,12 front 17:9,13,18 full 12:18 216:5 functions 138:15 fund 115:11,16,23 116:4 funding 48:6 112:4 114:7,11 funds 113:3 further 97:8 159:18 235:5,20 236:9 238:18 239:1 future 78:5
g			
g 12:20 75:13,13 76:3 133:19 gain 81:17 141:20 gallucci 2:6,6 11:11,11,12,15 game 31:8 games 64:2 gary 75:9 98:12 gates 118:25 gateway 133:19 134:14 136:4 gc 31:7 geared 49:4 gears 101:10 geez 77:1 gender 79:16 general 21:13 78:18 154:15 170:15 226:24			

general's 193:15 217:9 generally 78:21 generated 121:19 generic 101:6 george 16:2 42:4 54:9 gerome 1:13 5:7 12:10,15,19 13:7 44:12 60:24 61:10 61:14 71:23 117:22 150:4,18 164:2,12,14 168:17,23 171:7,9 171:21,22 184:21 185:4,4 210:23 217:17,24 218:18 219:8,10 231:9,11 235:23 238:9 240:8 241:4,9 242:4,13 243:20 getting 16:24 65:25 90:12,16 95:17 100:10 147:17 148:20 188:22 195:5 197:8 200:4 211:17 gilson 185:6 186:7 186:10,11 188:9 201:15 gilson's 189:23 gingell 75:9,11,13 98:12 gioitta 58:1 180:22 180:25 give 13:13 28:20 34:9,12 36:4 49:6 50:5 79:15 98:8 103:18 107:16 122:12 128:8	132:4 133:14 134:5,6 137:24 147:25 170:23 218:5 221:5 237:1 237:10 given 58:9 120:18 122:18 124:11 182:10 238:12,17 giving 98:5 120:19 168:12 212:18 glean 86:5 glory 146:3 gloves 216:4 go 17:25 24:21 28:8,14 29:13 33:3,17 35:8 37:17 38:8 64:9 69:23,25 71:23 75:19 81:7 82:1 82:12 86:11 88:2 89:15 95:6 101:17 110:8 111:18 114:20 118:8 119:19 121:16 123:20,21 124:9 125:12 135:4 136:7 143:7 147:18 159:17 160:14 161:24 165:16 167:13 173:7 181:24 184:18 189:25 194:23 210:8 214:23 216:4 goal 38:5 goes 60:8 81:5 86:25 87:23 95:10 100:2,11 148:10 148:14 172:10 186:23 190:10 194:22 198:7	going 31:11 37:17 41:7 46:19 47:15 49:13 50:17 60:21 67:2 72:1,1,16,21 77:25 78:7 79:1 79:22 86:13 100:9 103:18 105:6,23 130:2 142:7 146:25 150:16 151:2 156:15 158:2 162:13,14 171:6 177:10 181:24 219:17 good 11:17 12:17 16:11 59:25 111:2 117:13 125:15 183:3 gotten 47:16 177:20 government 197:22 209:22,23 210:3 graduated 19:10 grant 114:3 grants 112:12 113:19 114:5 217:11 gray 3:17 12:5 great 71:13 171:6 174:16 182:24 210:16 grew 17:24 group 110:20 152:6 223:21 groups 116:20 216:13 guarantees 219:21 guess 24:20 25:1 31:25 34:2 35:16 37:23 38:23 46:7 46:11 47:21 48:3	64:6,8 68:7,13 74:22 76:16 78:17 84:18 85:12 87:22 92:5 95:3 97:3 103:17 104:12 105:13 117:25 121:7 140:17 144:23 145:21 146:2,15 147:22 147:25 149:9 175:13,22 185:18 185:25 186:7,20 188:1 190:22 191:16 198:3 216:7 232:17 gun 112:22 guy 90:5,11 91:3 92:6 guys 11:8 33:19 35:8 46:16 61:8 68:22,23 69:15 75:22 76:2 84:21 95:3 130:2 143:25 147:19 148:12 182:20 183:2,19 216:8 <div style="text-align: center;">h</div> h 65:11 133:19 h.d. 207:9,9,13 hand 148:10,11,15 148:15 167:23 193:10 194:22,22 194:23,24 239:6 handed 173:9 handful 13:21 175:10,12 handle 77:25 78:8 118:2,15 handles 118:19 188:6
--	--	---	---

[handling - identifies]

Page 17

handling 75:21 119:11 hands 200:4 hanging 89:6 happen 121:13 137:15 140:16 142:2 happened 80:23 81:3 84:21 85:25 86:16 142:11 160:21,22 161:2 162:17 187:22 happening 194:17 happens 87:22,23 88:8,23 89:10 140:19 happy 60:1 hard 118:10 harm 232:5 hate 155:17 hawkins 3:8 11:25 11:25 hayden 3:18 12:4 hayden.miller 3:20 he'll 138:21 head 34:10 39:12 45:23,25 46:7,9 97:19 113:15 heading 151:14 165:4 heads 96:23 107:23 143:24 health 2:15 3:7 12:1 193:22,24 203:12,15 209:8 209:11 hear 95:5,5 136:12 194:14 197:25 heard 75:14 111:23 127:13	133:15 137:6 139:14 159:20 161:17,18,22 162:5,6 177:1 183:21,22,24 192:16 195:6 200:18,20,25 204:3 205:10 206:1,3,15 207:9 207:20 208:2 210:5 220:17 221:10 hearing 54:14 hearings 16:18,20 heavily 58:22 heights 13:5 77:3 77:12 78:6,14 118:18,25 119:7 126:2 held 19:24 help 58:9 60:8 68:17 74:24 119:24 149:17 182:16,16 198:11 helped 15:11 helpful 111:9 131:22 156:7 helping 60:6 76:5 79:23 212:18 helps 55:2 60:22 112:11 120:25 177:7 henschel 4:7 hereinafter 12:13 hereunto 239:5 heroin 41:19 55:6 55:16,17 86:19,21 86:25 87:3 90:5 90:12,13 99:12 107:4,8 111:24 122:8 124:5,6,9,13	143:17 148:6,7,9 148:14,16,17,18 150:13 151:4,8,8 152:19,22 153:7 153:17 155:20 156:10,16 157:15 158:20 159:1,3 166:19,24 167:14 167:19 169:12,14 186:25 190:22,23 194:23 195:22 196:4,15 197:15 197:19 198:4,13 198:22,25 202:15 211:3 222:25 223:16 225:21 heroine 186:24 187:16 hey 143:24 154:16 182:24 hidta 64:19 65:9 65:10 66:6 67:8 75:2 139:23 140:1 140:18 141:8,9,10 141:14 142:1,17 143:11 144:4,10 high 47:22 64:20 105:9 197:23 higher 19:21 hipaa 221:6 hire 44:1 hired 18:5 hires 174:17 hirko 45:5 67:13 67:14,16,23 92:22 92:23 182:7 192:9 192:10 history 85:25 86:12 129:3,4 134:7 235:1	hit 140:18 hold 72:23 120:5,6 157:25 home 64:8 216:9 homeland 63:17 65:1 66:25 67:20 hometown 68:16 homicide 80:2,3 85:2 honest 36:7 161:20 hopefully 144:1,20 208:16 hospital 33:5 hotel 105:18,21,22 105:24 hours 15:7 215:9 house 160:3 hugh 150:20 152:9 191:15 human 216:16 217:4 hundred 34:14 158:23 hundreds 25:5,7 hunt 185:10 hurts 60:22 hydrocodone 55:7
i			
idea 53:9 125:15 182:24 ideas 182:22 identification 61:3 127:24 150:8 164:6 168:21 171:14 184:25 217:22 identified 111:1 identifier 134:3 identifies 126:19			

identify 11:6 220:25 226:6,8,18 226:23 227:11,18 229:22	incomprehensible 40:1	172:11 187:2 189:9 192:5,13 195:4 198:8	interactions 59:15 178:12 179:6,10 179:16
identifying 119:22	inconsistent 229:18	initial 64:7 180:15	interdiction 105:20 165:5 198:6
iii 2:6	incorporated 242:12	186:20 193:23 230:17	interdictions 105:17,18,21
illegal 55:13,23 106:18 145:22 149:9 156:16 199:24 211:8,23	incorrect 69:9	initially 230:25	interest 212:16
illicit 55:23 90:16 196:22 224:11	incorrectly 226:14	injury 149:8	interested 239:3
imagine 114:2	increasing 153:13	inmates 18:16,18 22:21,24 23:18	internet 183:11,16
immediate 25:12 45:4 68:9 92:17	index 5:1,4,5 6:1 7:1 8:1 9:1 10:1	input 100:10,14 122:4,16	interpret 153:3
impact 35:10 68:5 68:8,12,25	individual 81:25 128:8 138:13	inputted 123:18 126:25	interrogation 87:17
important 54:3 91:9 119:23	individuals 99:6 99:10	inquire 149:16	interview 24:22 81:17 85:13,18,20 87:2,17 89:5 119:13,15,18 120:12
importation 198:4	influence 14:2	inquiry 128:9	interviewing 85:22 120:3,8
improper 200:14 229:25	info 125:7 128:7 132:14	insert 226:25 227:10 228:7 229:19	interviews 53:22 86:5 88:21 119:17 119:20 149:6 167:9,11,12
improperly 179:20	informant 49:13 120:20	inserts 227:17,24	introduced 83:18 219:10 231:15
inaccurate 229:2 229:11	information 52:16 56:23 78:23 81:20 83:14 86:4,5 88:25 89:1,4,8,16 89:17 100:17,19 117:11 120:14,18 121:15,23 122:2 122:11,24 123:18 126:25 127:8,20 127:23 128:11,16 128:17,24 129:12 131:21 133:23,25 134:5,8,11 135:3 135:22 139:9 140:10,13 141:2 141:19,23 142:3,8 142:15,17 143:11 143:19,21 144:1 149:19 161:14 165:12,14 166:14 167:2,6,25 168:8	inside 71:7 105:24 174:20	introductions 98:6
incident 134:20		inspector 166:13	inventory 104:13 104:14
incidents 44:15		inspector's 168:5	investigate 29:15 71:1 105:25 119:1 133:5 183:12 198:1,3,24 211:24 225:19
include 55:6,11 86:12 93:3,5 106:14 115:13 126:2 190:13,14		instance 226:19 228:3,9,10 229:15	investigated 77:11 86:22 91:8 93:21 94:1,5,9 153:11 159:25 160:1 162:12 169:20 226:1,3 228:19
included 32:18 86:6 150:23 166:8 199:2		instances 190:25 194:12 226:9	
including 45:2 55:5 74:6 83:8 128:13 134:8 155:9 156:9,10		instructed 143:15	
inclusion 165:13		instruction 237:2 237:10	
		insys 204:10,11,13	
		intelligence 81:18	
		intended 96:5 167:10	
		intending 132:22	
		intensity 64:20 105:9	
		interact 74:17 76:10	

[investigated - know]

Page 19

235:1 investigates 53:18 investigating 44:20 56:22,25 66:8 79:6 81:23 87:14 93:24 124:8 135:16 142:10,20 142:22 149:10 160:7,24 183:20 183:20 189:3 195:19,20 199:16 225:3,12 228:22 investigation 20:21 27:19 73:3 73:8,16 76:22 77:16 81:21 88:9 89:11 93:16 94:14 114:6 119:21 121:1,2 132:1 135:2 141:21 143:17 149:18 156:1 180:7 184:11,14 189:8 investigations 37:24 38:9 40:15 49:23 58:24 65:2 74:16 75:7 76:11 77:4,8,25 86:11 89:12,14,23 90:2 113:7 114:16 118:15 122:3,8,10 125:13 127:9 131:23 132:12 135:18 141:16 143:10 145:15 147:1,1 148:12 160:19 162:16 180:1,5,11 182:25 184:3 189:19 195:9 215:4,23 216:22,23 217:13	234:2,4,4 investigative 121:8 140:6 investigator 199:15 233:21,25 234:6,10,23 investigators 123:15 invited 100:4 118:1 involved 25:3 32:6 58:22 79:17 97:24 111:14 133:2 140:22 146:7 177:21 184:3,10 189:16 191:25 192:21 234:1 involvement 21:23 23:3,22 31:15 32:2 40:14 68:1 69:6,11 70:19 105:8 109:13,18 183:18 involving 180:5 198:25 issued 51:14,20 issues 21:24 35:18 35:19 62:25 63:22 64:4 68:2 69:6 70:19,22 153:7,7 179:12	january 83:19,19 jeoeta 181:3 jingles 75:14 job 16:24,25 50:23 51:3,11 59:25 110:4 139:1 145:25 180:25 198:2 jobs 35:25 john 3:12 11:18 58:1 180:22,25 johnson 206:10,10 206:21,21 join 18:3 joined 24:25 jones 2:11 11:24 jonesday.com 2:14 jopek 58:2 180:22 180:23 journey 214:17 jpetkun 3:6 judge 1:8 110:9 judges 98:13 99:9 109:22 110:6 judgment 157:7 jump 166:18 jumped 96:6 jurisdiction 78:1 142:11 187:25 jurisdictions 76:22 79:22 117:25 118:5 jzipp 3:15	kaye 2:16 11:21 219:13 keep 72:22 78:1 92:3,8 122:6 125:2,3 126:24 127:11 191:17 keeping 124:20 125:15 135:1 138:6 202:21 keeps 56:19 92:15 117:8 135:5 138:8 keith 60:11 98:15 kelley 1:20 kept 84:9 102:16 138:12 194:5,11 194:15 kids 155:22 kind 26:16 33:20 35:11 38:13 58:16 60:5 68:20 70:4 80:1 87:15 92:10 107:13 109:5,10 110:8,9 118:21 127:20 128:7 133:23 135:1,25 136:22,24 140:4 142:7 143:10,23 145:23 161:13 183:25 197:23 kinds 70:9,11 kit 194:7,8,9 knew 26:7 27:4 150:12 knock 29:13 know 17:10 21:7 22:2,3,20,23 23:2 23:21 25:19 26:8 27:1,5,12,16 28:25 30:8 32:8,9 33:6 33:23 34:20 35:12 35:22 38:7 40:19
	j		
	jackson 27:8,9 31:23 jail 22:4 23:19,20 71:6,8,10 114:4 174:20,21 james 3:3 jamie 138:19 janssen 206:15,16 206:21	k	
		k9 63:7,8,9,10,13 68:4 166:11,12 167:3,7 168:4 k9s 63:16 64:24 kaleal 46:2,3 113:16 117:11	

[know - lead]

Page 20

41:2,5,21,21,23 43:24 44:1 45:12 46:6,8,17,20 47:20 48:8,8,9,20 49:3 49:17 50:20 52:2 52:6,12,19,21 53:6 55:8,22 57:2,4,5 57:12 58:14,15 59:4,21 60:5,7,15 63:23 65:15,17,18 65:20 67:5,21 70:5,14,15,24 72:23 73:19 75:2 75:20 77:15 78:20 78:24 79:4,24 80:12 81:20 83:2 85:11,23 86:1,2,12 86:14 87:15,16,18 87:20 88:15,17 89:5,16,21,24,25 90:13,21,23 91:20 91:22,23 93:13,19 93:20 94:20 95:8 95:17 96:1 97:8 98:2,9,17 99:16 100:16,20 101:21 103:14 105:19 106:5,8 107:25 108:6,10 109:3 110:1,16 111:13 112:3,9 113:2,11 113:14 114:4,24 115:14,15 116:2 116:22 117:2 118:23 120:3,4,7,8 120:9,13,19,20 121:8,11,12 122:5 123:23 124:2,3 125:11,11,18 126:6,14,16 127:3 127:10 129:19,24	130:3,22 131:1,15 132:20 135:19,19 136:3,11,12,25 137:9,11 139:4,7 139:18,19,21 141:3,20 142:22 143:12 144:3,6,11 145:5,5,8,12,20,22 145:25 146:9,16 147:7,25 148:18 148:23,23 149:2 149:21,25 150:1 151:1,15 152:4,9 152:14,15 153:22 154:19 155:23 156:2,3 157:7,11 159:3 160:2,20,21 161:3,8,20,21 162:22,23 164:25 167:1,5,9,20 169:7 169:8,23 170:6,19 170:21 171:17 172:1,19,21,21,22 173:15 174:5,11 174:12,21,23 175:7,7,20 177:12 178:17,20 179:9 179:13,15,18 181:11,13,16,18 181:20,22 182:21 182:23 184:1 185:17 186:15 187:7,12,15,18,19 188:4,10,15,21,23 188:24 189:10,12 189:22 191:3 192:12,12 193:23 193:25 194:12,13 194:21,22 196:8 196:10,23,25 197:24 200:10	201:4,18,20,22 202:18 203:3,3,10 203:18 204:2,9,10 204:13,17,24 205:7,16,23 206:9 206:13,25 207:8 207:16,25 208:7 208:15,24,25 209:7,14,21 210:2 210:13 212:14,16 212:18,20,20,23 213:23 214:7,8 217:10 218:11,21 220:2,3,8,12,12,13 220:16 221:14,18 222:6,17,22 223:12 224:15 225:9,19 227:21 228:17 230:17,19 230:21,22,23,25 231:3 knowledge 85:19 113:24 114:1 160:1 195:8 199:9 199:14 201:10 226:2 231:21,24 knowledgeable 202:19 knows 138:17 kozub 68:9 kurt 4:7	labeled 61:13 labels 227:24 labs 152:19 lack 47:24 115:4 lacking 48:23 ladder 58:20 lakeside 2:12 lakewood 118:16 language 227:23 large 118:16 195:23 196:5,16 223:4 larger 168:10 lasted 72:25 lately 80:18 115:17 latest 49:1,18 law 13:10 14:5,11 14:19 18:22 19:12 20:4,13 56:20 64:23 70:21 76:8 85:16 102:9,10,14 102:16,23 103:25 104:1,6 106:17 107:15 115:11 117:5 127:14,14 127:25 129:15 133:18 135:6 139:9 140:14 141:18 144:24 219:12 lawful 12:10 laws 221:6 lawsuit 53:7 54:6 54:11 lawyers 54:6 lead 88:4 106:1 115:6 122:25 123:15 144:14 234:10,23
		I	
		I 1:25 75:13,13 133:19 168:4 238:6 239:13 l.p. 1:10 label 150:22 164:17 171:25 226:25 227:5,9,16 228:7 229:18	

leads 106:4 127:14 127:21,22 128:8 128:23,23 129:7,8 129:10,11 133:16 133:17 134:1 136:4 137:16 157:14 189:10	45:3 46:10,19 48:12,13,18 50:1 50:14 60:17 62:12 62:13,14,21,21 63:5 64:12 65:14 66:23 69:3,9,10 70:16 71:24 72:12 80:12 97:7 104:7 104:9 109:21 119:9 124:17 146:24 154:18,22 155:1 168:15 169:6 171:2 176:15 186:17 234:21	241:3 242:3 little 31:9 48:2 49:14,15 69:19 73:24 86:2 98:16 101:10,11 118:22 126:7 133:25 135:3 140:15 144:19 158:3 159:17 173:22 174:24 216:7 live 13:4,5 57:19 83:20 213:19 lives 194:13 living 29:14,15,17 liza 4:3 liza.fleming 4:5 llp 1:20 2:16 3:3 3:11 4:3 11:18 local 76:8 77:20 79:10 139:9 locally 178:23 locals 80:1 locate 141:3 located 69:21 104:25 location 79:16 121:23 240:15 log 130:3,6 138:8 logan 3:4 lonergan 2:17 5:9 11:20,20 219:9,12 221:2 231:4,7 long 15:6 19:6 22:9,10 25:19 27:23 28:22 29:22 43:18,21 46:3 57:15,16 59:9,10 59:12 60:12 65:13 65:15 66:21 72:18 72:24 80:8 83:13 83:13 97:4 102:6	111:14 176:17 181:13 186:13 225:7 234:7 longer 43:25 71:11 104:23 156:13 look 35:8 38:8 56:21,22 61:23 66:9 82:6 84:24 85:6 101:11 127:23 128:2 130:1 134:1 142:18,20 150:10 150:17 151:2 167:22 171:16 173:9 185:3 191:2 201:23 202:12 227:5 236:8 looked 52:12,22 162:9 169:4 170:4 187:22 looking 26:13 52:8 57:14 66:7,10 91:9 93:5 110:6 110:19 139:11 166:3 187:1 looks 69:18 141:25 169:13,13 201:20 lorain 104:25 lost 164:23 lot 47:6 75:9 83:25 86:18 88:25 95:16 136:18 150:17,18 155:14,21 198:16 198:21,24 214:17 219:20 lots 139:4 lou 181:4,5 loved 156:4 158:9 lower 185:16 lump 223:21
--	--	---	---

[lunch - meetings]

Page 22

lunch 159:18 163:1 174:25 luncheon 163:5	126:23 129:15 managing 44:24 mandate 35:24 manner 16:19 225:4,13 manpower 34:5 182:17,19 manual 73:5 manually 128:4 manuals 73:2 manufactured 201:22 manufacturer 184:15 228:20 229:10,17 manufacturer's 229:1 manufacturers 94:9 219:15 maps 142:13 march 28:1 marcus 71:11 marijuana 24:4 26:17 32:7 106:10 106:25 107:8,13 mark 66:20 171:7 marked 6:3 61:2 150:7 164:5 168:20 171:13 184:24 217:21 market 4:4 211:9 marketing 229:25 marking 104:16 mart 209:8,11 martin 60:11 98:15 material 104:19 matter 11:3 90:3 144:8 170:6 226:24 240:12	matters 13:23 mayfield 13:5 118:24,24 mckesson 3:11 11:19 207:1,2,5 mclaughlin 2:12 5:10 11:23,23 231:10,16 235:5 md 1:7 mdl 1:6 mean 43:2 48:15 53:14,16 58:3 70:6,21 72:21 93:6 95:5 99:8,15 105:20 111:7 119:22,25 127:2 132:4 139:3 149:14 153:10 161:19 175:9 182:14 196:12 197:21 201:20 212:14 221:5 224:17 meaning 78:4 means 53:17 224:11 meant 173:8 meder 65:12 67:15 media 154:14 162:8 194:14 195:10 medical 23:19 41:23 53:11 62:15 62:16 71:3,4,6,7 75:25 79:11,12 86:15 88:16,18 89:18 94:15,18 114:3 119:24 122:18 127:3 132:22 152:13 177:3 178:12,16	178:17 179:2,2,17 186:11,14,16 187:8,16 191:7,8 191:11,12,17 200:13 201:6,11 220:9,9 221:16 222:9 232:15,19 medically 220:4 226:11,21 medication 22:25 23:1 156:14 158:11 161:25 201:21 212:19 214:18 222:14 224:20,21 225:25 medications 23:6 26:23 55:12,13,21 94:10 99:5,22 103:22 104:2 106:15,21 132:21 149:4 158:14,21 162:15 174:22 177:15,22 183:11 199:6 211:12 medicine 23:9 meet 15:1 151:18 151:19 meeting 15:6 54:13 72:24 96:24 97:19 98:11 99:2 100:9,11 101:7,8 101:24 102:11,12 102:12 103:15,20 104:2 108:9 meetings 96:21 97:12,13 98:2,23 99:21 100:3 101:4 101:13,14 102:1,8 102:10,17,24 103:2,19 104:1,6 108:14 111:18
--	--	--	--

151:20,25 195:16 199:19 member 16:21 18:21 31:1 132:15 149:20 156:23,25 158:6,7,12 members 53:23 64:11 81:19 85:19 112:5 120:5,6 125:25 156:19,20 157:12,17,22 175:1 213:8,13,15 213:17 214:13 memories 151:3 memory 151:7 men 95:18 mentioned 51:10 64:17,24 75:1 117:22 118:18 119:6 124:6 140:4 155:13 157:20 166:11,12 199:2 200:6 mentioning 195:10 messages 51:11,23 met 14:25 metro 33:5 mexican 195:14 mich 36:9 michalosky 32:24 32:25 36:10 37:2 39:18 42:6,14 150:24 midwest 243:1 miguel 16:13 25:13 31:20 mike 27:7 168:3 mileage 215:9 mill 104:22 161:17 162:6	miller 3:18 12:4,4 mills 118:25 millsap 28:19,21 mind 93:3 190:16 212:16 mine 95:12 214:14 mini 118:22 minute 61:24 117:14 150:10 171:16 185:2 193:16 minutes 57:18,18 101:3,4,5,11,12,13 101:19 102:14,16 159:19 176:21 235:12 misleading 173:16 173:17,22 229:2 229:11 missing 119:3 216:10 mission 38:1,2 40:3 48:6,24 68:11 81:14 105:15 mixtures 200:25 mobile 128:5 moment 47:19 62:14 moments 230:5 money 27:20 49:4 113:4 114:14 115:4,6 116:4 211:15 monitor 183:11 monitored 69:22 monteleone 45:5 170:6,7,8 172:23 month 96:25 102:2,5 103:2,9	monthly 172:7 months 19:8 32:20 96:25 morgan 4:3 morganlewis.com 4:5 morning 11:17 12:17 morphine 55:7 motel 105:21,24 moved 18:17 28:9 28:25 42:19 44:9 44:10 181:17 moving 146:23 multiple 81:9 municipal 22:18 municipalities 79:8 118:10	122:14 137:25 175:19,23 naming 118:11 napkin 82:19 napoli 2:2 11:10 napolilaw.com 2:5 narcan 192:23 193:19,21 194:1,7 232:18 narcotic 20:21 21:1,23 26:14 27:24 73:3 147:11 170:20 213:5 narcotics 21:19 23:23 24:1,7,8,25 25:2,25 26:7 28:6 31:15,19 32:2,6,20 33:10 34:4,18 35:2,4,18 37:8,12 37:14,18,20 38:2 38:21 39:3,11,13 39:22 40:3,20,24 43:14 44:3 46:14 47:1,9,11 48:5,13 48:23 49:24 55:13 58:17,19 62:24 63:7,7,8,9,10,13 63:19,22 65:2,7 66:4,16 68:2,4 69:6 70:19,22 72:1,7,8 73:7,15 73:23 74:1,5,16 75:7 76:11,13 81:5 84:7 92:25 93:2,6,11,17,22 96:7 105:13 107:12 108:7 111:3,6,9 113:22 116:14,17 117:23 122:3 123:9 124:17 131:23
		n	
		n 75:13 n.w. 3:8 naloxone 192:18 193:7,13 name 12:18,19 15:4 20:10 28:19 28:20 38:22 61:8 62:9 77:5 82:23 97:22 122:13 124:3,11,14 134:3 140:11,12,18,21 143:4 151:15 152:7 160:18 164:24 165:8 167:24 185:9,11 220:25 221:5,8 231:16 240:6 241:3,4,15 242:3,4 242:21 named 238:9 names 55:8 62:7 83:10 89:6 120:21	

133:3 134:17 137:13 138:17 144:16,22 145:14 147:10 148:7 154:18 168:10 169:20 170:12 171:3 172:24 178:6 180:13,14 181:16 182:1,3 197:16,24 202:4,6 202:23 215:3,4,22 215:22 217:12,12 234:3,5,6 narrator 57:20 national 1:6 11:3 240:6 241:3 242:3 native 218:15 necessary 226:11 226:21 need 46:17,17 60:7 68:20 74:22,23 82:5,6 112:23 138:16 154:20 218:24 needed 52:8 81:11 needle 190:14 needs 45:14 79:6 222:9 neglect 36:6 negotiated 215:15 neighborhood 34:21 107:20 neighbors 81:18 120:3 neither 55:19 nelson 38:17 network 139:10 networks 195:23 196:6,17 197:1 never 57:1 63:25 93:24 100:12,19	142:25 183:24 206:1,3 214:11 215:8,12 225:25 234:13 new 2:4,4,18,18 3:19,19 38:11 49:7,18 119:7 126:24 137:17,25 174:17,17 202:17 202:20,24 news 179:1 newsletter 6:11 171:11,24 172:5 172:15 174:6 nicotine 149:22 nighttime 95:24 noletf 64:22 66:19 non 80:24 214:16 230:12 noramco 205:17 205:18,21 normal 60:6 80:3 112:23 normally 100:2 191:1 north 2:12 northeast 64:23 83:6 northern 1:2 notary 238:6 239:13 240:25 241:10,18 242:15 242:23 243:23 note 171:21 notes 130:7 175:17 notification 120:6 notify 79:11 november 1:15 11:2 239:7 240:4 nowadays 128:20	number 6:3,7,12 6:14 25:4 73:23 74:5 92:4,9 121:3 121:6,12 122:13 134:4 146:19 150:6 164:25 167:15,16,19 168:25 169:19 171:12 175:7 184:23 187:5,17 187:17 201:12 218:3,13 240:7 numbers 61:6 121:19 165:19 185:8 242:7 numerous 59:20 nurse 23:7 nursing 71:9 nuts 95:10 nw 3:13 o o 12:20 36:25 133:19 168:4 190:3 oarrs 56:7,11,13 56:17 57:3,6,10 131:3,8,12,16,21 oath 13:8,8 object 38:10 objection 7:3,3,4,4 7:5,5,6,6,7,7,8,8,9 7:9,10,10,11,11,12 7:12,13,13,14,14 7:15,15,16,16,17 7:17,18,18,19,19 7:20,20,21,21,22 7:22,23,23,24,24 7:25 8:3,3,4,4,5,5 8:6,6,7,7,8,8,9,9 8:10,10,11,11,12 8:12,13,13,14,14	8:15,15,16,16,17 8:17,18,18,19,19 8:20,20,21,21,22 8:22,23,23,24,24 8:25 9:3,3,4,4,5,5 9:6,6,7,7,8,8,9,9 9:10,10,11,11,12 9:12,13,13,14,14 9:15,15,16,16,17 9:17,18,18,19,19 9:20,20,21,21,22 9:22,23,23,24,24 9:25 10:3,3,4,4,5,5 10:6,6,7,7,8,8,9,9 10:10,10,11,11,12 10:12,13,13,14,14 10:15,15,16,16,17 10:17,18,18,19,19 10:20,20,21 14:17 17:8 21:20,25 23:25 25:6 26:24 32:4 34:23 35:20 36:2 39:24 41:8 41:18 43:1 44:6 44:16,21 48:1,7,25 50:8 51:2 52:5,17 55:15 56:3 59:2 64:5 66:2 69:1,7 70:10,20 73:9,17 82:7 90:18 93:18 103:16,23 107:11 108:8 111:11 112:20 113:8,23 114:17,22 116:15 116:23 121:18 130:25 131:9,18 131:24 132:7 135:13 139:6 141:17 142:5,24 145:2,4,11,19 146:12,18,21
--	--	---	---

[objection - okay]

Page 25

147:5 148:19,22 149:1,5 152:24 153:1,9,15,18 154:1 155:6,11 157:6 158:15,22 159:2,8 160:5,13 162:2,21 173:14 174:7 175:6,11 176:19 177:16,24 179:22 180:3 182:13 183:7 188:25 189:6 191:14 194:20 195:7,24 196:7,18 197:4,10 199:13 200:16 201:24 202:7 203:9,17 204:1,8,16,23 205:6,15 206:8,24 207:7,15,24 208:6 208:14,23 209:6 209:13,20 210:1,4 210:12 211:6,21 212:5,13 215:5 217:14 220:1,5,15 220:22 221:17,23 222:5,10,16,21 223:18,23 224:12 225:16,23 226:12 226:22 227:2,7,13 227:20 228:2,16 229:4,13,20 230:3 232:7 objections 5:5 7:1 8:1 9:1 10:1 objective 81:24 obligation 52:25 82:13 observed 82:16 obtain 89:7 113:5 199:5,24 202:5	obtained 88:25 199:11 224:10 obviously 19:9 85:15 89:18 110:1 occasionally 67:16 occurred 29:3 107:17 occurring 142:14 october 61:12,23 239:16 offender 29:1,6 offender's 29:13 offenders 29:8,9 29:12 110:8 offense 92:6 106:20,24 offenses 13:25 23:23,23 44:20 92:5,10 114:6 offer 20:19 60:8 offered 149:19 offers 21:13 offhand 34:20 89:25 175:8 215:25 office 45:13 50:4 50:18,19 52:13 63:15 94:22 97:22 140:17 141:7,8 151:18 152:13 155:25 160:3 168:6 187:20 191:18 217:9 232:10 235:3 239:6 240:14 officer 14:12 18:6 18:10 19:13 20:9 20:14 21:22 22:3 38:14,15 57:11,21 59:19 87:23 112:23 132:3	133:14 167:3,7 180:16,17 officers 34:18 59:6 64:18 74:10,12 112:8 134:12 145:24 198:5 offices 58:12 official 20:10 82:10 86:15 241:15 242:21 officially 111:20 oh 14:8 92:20 172:2 ohio 1:2,22 2:8,13 11:5 13:2 18:7 20:9 29:10 30:18 56:14,14 64:23 83:6 88:18 127:24 128:1 131:4 133:18 134:20 135:8 139:9 178:12 179:2,6,11 210:3,9 238:2,7 239:7,14 240:2 ohleg 133:19,24 134:14 oibrs 134:22 135:11,15 okay 12:7 15:3,6 16:5,10 17:12 19:6,18 22:23 24:6 25:10,23 26:21 27:16 28:22 29:5,25 30:11,13 30:20,25 31:3,18 31:25 32:14 33:6 33:14,23 34:25 36:19 37:1,17 39:17 41:24 42:2 42:5,14 43:6 45:16 46:11 48:4	48:9,21 50:5,12,25 51:6,17,22 52:2 53:4 54:10,15 55:20,25 56:13,16 57:9 59:5 61:20 62:1,8,24 63:4 65:21 66:24 67:5 67:11,14,24 68:11 69:5 70:17 71:3,9 71:13 72:5 73:10 73:22 74:15 76:15 78:9,17 80:20 81:8 82:18 84:5 84:17 88:8,23 90:11,15 91:19,23 92:8,20 93:9,20 95:3,18 97:8,18 101:25 102:6 104:5 106:1,5 107:18 108:1,19 109:9 110:11,25 111:14,18 112:25 113:2,11,18 114:1 114:10,13,24 116:2,9,11 119:12 121:24 123:19,23 125:6,10 126:5 129:5,14,19 131:11 133:1,7,11 133:15 136:18,23 137:11 138:16,23 139:3,8,16 142:9 144:8,19 145:7 146:23 147:9 149:3 150:2,15,25 151:6,11,22 152:14 153:12 154:4,4,10 158:25 159:24 162:5 165:2,8,16 166:5 166:17 167:1,8,13
---	---	--	---

[okay - overdoses]

Page 26

167:18 169:5,12 169:18,23 170:1 170:11 171:4,6,20 172:2,3,9,19 173:12 174:16,21 175:15,17 177:7 177:19 178:7,11 179:5 180:9,17 182:8 183:2 185:15,20 186:8 186:13,19 187:9 187:23 188:7 189:17 190:23 193:5 194:10 195:12 199:17 200:18 201:4,15 203:23 205:3,12 208:8 213:7 214:3 214:8 217:4 218:12,21 219:3 219:16 221:10 234:25 old 190:4 olleisn 139:13 once 96:24,25 102:2,5 103:2 191:16 234:18 ones 35:6 71:1 77:10 80:18 95:19 95:25 97:16,23 111:2 118:13,16 119:4 120:10 ongoing 180:4,6,7 online 20:19 21:13 56:5,7,9 134:10 op 1:10 opba 30:17 31:1 open 189:7 211:14 236:4 openings 24:16	operate 46:18 operating 14:1 72:9 operation 46:23 50:15 96:3 operations 47:7 111:10 112:19 115:5 116:5 168:9 195:14 operator 138:15 opiate 1:6 11:4 96:17 97:3 98:23 99:21 100:2,2 140:1 148:5,10 152:3 240:6 241:3 242:3 opioid 22:25 53:12 53:14 54:23,24 56:2 87:4 111:24 150:13 151:4,8 154:8 155:5,9 156:9 160:11 161:25 174:22 183:11 199:10,11 200:12 203:8,16 203:25 204:7,14 204:22 205:5,14 205:21 206:6,22 207:5,13,23 208:4 208:12,22 209:5 209:12,19,24 210:10,25 211:5 211:19 212:3,12 220:18 221:12,22 222:4 224:2,7,10 224:24 225:4,13 226:10,19 227:6 227:12 228:4,11 228:14,20,25 229:10,17,23	opioids 17:20 55:5 55:21 56:1 98:24 155:15 159:22 160:2 162:1 177:3 178:19 179:12,17 179:20,20 183:16 183:23 184:5,12 184:16 190:24 198:19,20 199:3,5 199:21 200:2 212:2,11 213:9,14 219:23 220:4,9,14 221:16 222:19,25 223:10,11,15,17 224:3 225:21 226:4 227:10,17 227:19,25 229:3 229:12 230:7,14 230:18,18,21 231:1 232:5 opposed 35:18 47:25 90:17 95:8 202:15 optional 193:10 order 130:19 183:22 ordering 183:15 orders 45:12,13 174:22 184:4,12 184:16 224:8 ordinarily 63:5 ordinary 46:20 85:24 152:18 185:18,23 org 60:22 110:19 116:24 organization 61:18,21 organizational 6:5 61:1	organized 60:21 62:4 original 173:24 originally 17:23 18:5 23:16 outset 219:11 outside 58:6 70:17 76:2 172:20 outstanding 128:19 overall 117:7 overdose 40:15 41:13 76:19 77:17 78:6,11,19 79:5,5 79:10,15 80:16,21 80:22 84:12,15 86:19,21,25 89:23 90:2 91:8,12 93:10 117:24 118:7 121:9,10,13 122:8,10 124:8,9 124:10 125:4,17 127:8 141:16 142:11 143:18 148:6 149:11 153:7,16 175:1 186:25 187:1,16 188:6 201:11 214:6,19 230:9,14 234:14 235:2 overdosed 78:15 78:21 87:3 93:11 93:16 126:20 156:25 201:13 214:15 230:16,22 overdoses 40:8,10 40:15,17 41:3,11 41:12,17,19 44:25 53:18 75:21 76:20 85:4 99:13 124:5 124:6,7,13 125:18
--	--	--	---

125:23,24 126:2 140:23 142:13 143:16 147:16,17 147:19 155:13 166:19,24 167:14 169:12,14,20 173:16,19 191:13 212:25 213:16 215:11 216:5 223:1 230:13 overdosing 148:17 153:25 188:18 overprescribing 178:18 oversaw 28:10 29:10 35:7,10 oversee 32:20 43:14 105:13 overseeing 32:17 35:14 37:7,16 39:19 46:15 48:13 63:1 oversees 71:7 75:9 oversight 75:6 overtime 112:7 ovis 14:1 oxycodone 55:7 oxycontin 202:16	paid 112:8 194:2,4 pain 55:3 188:17 pair 38:12 paper 50:6 73:6 102:22 papers 90:4 par 2:15,16 11:22 219:15 paraphernalia 85:10 190:10,13 190:17 parents 43:2 155:24,24 parma 77:3,6,7,11 78:6,14 118:17,17 119:6 126:2 186:3 187:22 part 18:25 41:4 75:24 85:12 86:6 96:21 110:13 113:9 123:11 156:11 176:20 197:24 223:4 229:6 231:18 232:9 242:9 participate 97:25 108:2 participated 98:1 100:22 104:8 participating 112:18 particular 41:15 55:8 113:12 121:16 146:7 214:14 particularly 145:16 146:9,10 147:3,4 198:6 parties 219:5 parts 155:8	party 239:2 pass 219:3 230:11 passed 230:8 passing 133:9 patch 90:24 patience 231:12 patient 212:17 220:18,21 221:21 222:3,15,19 224:6 225:3,12 228:15 patient's 212:15 222:9 patients 212:10 220:14 229:3 patrol 23:17 24:19 26:6,10 28:9,23 31:12 32:18 33:18 34:1,3,5 patrolman's 30:19 pay 112:14 146:4 194:1 215:12,18 216:19 pays 115:25 peace 20:9,14 pellegrino 1:25 238:6 239:13 pending 132:12 pennsylvania 3:5 4:4 people 22:9 25:2 35:9 59:14,24 69:20 70:25 74:5 79:13 85:4,18,21 91:3 95:16 111:1 111:7 112:18 119:15,15 120:10 137:24 143:9,9 146:19 148:16 150:21 153:24 155:16,18 159:4 159:12,15 160:8	160:15 161:24 162:13,14 182:11 185:7 188:18 198:14,19 199:4 199:20,24 200:1 201:12 211:2,11 223:11 224:2 230:21 people's 56:20 84:2 percent 158:23 percentage 35:17 percentages 200:10,17 period 42:9 person 29:17 38:11 39:21 78:14 79:16 80:21 85:16 85:20 86:13 87:3 89:3,8,13 91:13 93:11 94:20 97:12 97:13 100:1 123:4 126:19 130:10 138:14 142:8,23 143:5 147:24 157:9 160:25 180:20 183:4 190:19 201:9 217:5 221:1,12 224:9 person's 129:3 143:4 221:5,8 personal 51:14,17 51:20 214:12 230:6,6 231:21,24 personally 44:11 76:12 105:10 106:19 145:17 153:6 156:18 200:10 232:3 234:13 235:1
p			
p.m. 236:14 package 165:5 202:5 226:25 227:10,17,24 228:7 229:19 page 61:10 164:23 164:23 165:4,5,12 169:1,2,8 170:5 171:18 185:25 187:2 190:2 217:24 218:9,13 242:7 243:3			

<p>241:11 242:15 personnel 34:6 47:15,25 193:13 pertain 191:13 pertains 62:24 peters 108:17 petkun 3:3 pglawyer.com 2:9 2:10 pharma 1:10 204:3,6,25 205:1,4 pharmaceutical 2:16 206:18 219:14 229:16 pharmaceuticals 2:15,15 4:2 23:12 204:18,21 208:25 209:4,15,18 pharmacies 23:12 94:2 161:23 179:19 pharmacist 174:18,18 pharmacy 91:19 160:4 174:22 179:7,11 184:4 philadelphia 3:5 4:4 phone 12:3 51:14 51:15,20,20,23 52:8 76:17 77:24 85:9 89:1 91:10 91:10 95:9,12 137:23 156:21 224:17,18 235:9 235:10,11 240:3 phones 51:16,25 52:3 89:2 95:4 phonetic 27:2 photograph 81:16</p>	<p>photographs 88:14 phrase 183:22 physically 58:11 physician 221:19 222:1,7,12 226:19 228:4,6,11,13 229:12 physicians 93:22 93:25 229:3 pick 69:23 pickup 40:12 69:17 picture 128:13 piece 73:6 85:8 91:9 174:6 pieces 50:6 102:22 pill 40:12 69:17 90:24 160:10 161:17 162:6 190:18,18 212:20 215:7 pills 40:8 53:20 69:20,23,25 70:4,5 104:16 143:17 148:10 160:17 167:14 194:23 195:22 196:4,15 201:19 212:20 pinkney 36:17 42:16,20,24 pinpoint 196:24 place 97:5,7 154:19,25 160:19 161:24 238:19 places 72:13 plaintiff 11:10,12 11:16 plan 6:15 111:25 150:13 151:4,9 217:19 218:1</p>	<p>plastic 85:8 please 11:6 12:17 20:12,16 36:10 45:11 59:18 150:17 158:4 171:16 176:6 184:19 187:14 212:7 213:10 220:6 221:24 225:8 229:5 240:14 plevin 2:6 11:12 11:15 pllc 2:2 point 2:12 31:16 72:3 147:7 162:20 232:3 pole 49:10,11,11 police 18:7,24,25 20:7 33:5 69:22 74:18 75:5 77:7 79:11 83:9 98:12 106:3 118:16,17 118:19 120:2 121:8 129:22,25 130:1,7 186:3 policies 44:14 policy 20:8 44:13 193:9 polster 1:8 pop 121:21 128:18 128:19,20 populate 134:5 porter 2:16 11:21 219:13 position 16:23 24:17 29:25 30:23 42:19 185:16 221:20 222:2,8,13 possible 79:15 149:24 189:9</p>	<p>227:18 post 63:14 220:19 postal 166:13 168:5 posting 24:16 potential 79:5 85:14 powder 90:25 91:1 206:12 practice 133:2 practices 228:19 pre 22:16,17 predated 154:25 prefer 240:16 preferred 124:21 preparation 15:23 prepare 14:21 prepares 101:22 preparing 15:22 prescribe 220:13 229:3 prescribed 221:1 221:11 224:7,20 224:20 225:5,14 226:19 228:4,11 229:23 prescribes 229:12 prescribing 199:23 220:18 222:14 225:20,25 226:4 228:7,14 230:1 prescription 1:6 11:4 22:25 26:23 40:8 55:13,18,21 56:6,15 58:24 69:20 70:8 87:4 90:17,19 93:4,11 93:17,22 94:10 98:24 99:4,22 103:21 104:2</p>
---	--	---	--

[prescription - purposes]

Page 29

106:14,21 149:4 154:7,8 155:15,19 156:14 157:18 158:10,13,21 159:21 160:2,11 160:11,17 161:25 162:15 174:22 177:15,22 178:19 180:2 183:15,23 190:24 196:23 198:18 199:2,5,10 199:12,21 200:2 200:12,13 201:21 211:11 212:2,10 213:9,14 214:18 219:23 220:3,8,14 220:18 221:12,16 221:22 222:4,18 222:25 223:11,15 223:16 224:2,3,7 224:10,24 225:4 225:13 226:4,9,21 227:1,5,10,12,17 227:19,24 228:4 228:11,20 229:23 230:7,14,18,20 231:1 240:6 241:3 242:3 prescriptions 56:20 70:9,11 99:12 132:2,6,9,14 160:8 199:7,24 212:2,10 presence 88:20 238:14 present 4:7 12:7 15:3 52:22 85:19 presentation 193:17 preserve 52:25	president 154:15 presumably 39:18 43:2 pretty 30:9 35:21 101:6 168:3 185:9 prevalent 41:17 201:8 preview 150:11 previously 225:1 225:10 228:6 primary 68:11 principal 63:12 100:1 106:6 138:23 139:1 148:6 print 218:4 prior 83:21 84:5 158:20 169:4 183:20 priorities 44:19 68:25 prioritize 35:24 priority 147:9,14 147:16 prisoners 22:18 prisons 23:20 probably 14:20 25:9 29:24 30:3 31:9,20 34:14,24 35:22,22 40:1 45:5 54:3 57:13 57:17 63:23 72:20 76:4 80:25 92:16 95:11 99:6 107:14 118:8 133:13 140:20 146:4 162:8 166:15 167:11 168:15 169:10,22 175:14 175:16 178:9 180:15 193:16	194:16 196:19 198:9 214:22 218:15,16 232:20 234:10,21 problem 58:25 145:1,10 154:6,12 154:16 194:19 203:16,25 204:7 204:14,22 205:5 205:14,22 206:6 206:22 207:6,14 207:23 208:4,12 208:22 209:5,12 209:19,24 210:10 210:25 211:5,19 212:3,12 procedure 12:12 77:18 78:18 237:7 241:5 242:5 proceeds 114:19 process 24:22 79:2 produced 236:1 product 230:1 product's 229:18 production 52:4 240:24 program 40:11,13 41:10 69:17,17 70:13 104:11 122:7 137:20 183:6 200:1 215:7 programs 98:18 154:19,21,24,25 project 6:15 192:16,20 217:19 218:1 promoted 20:1,2,3 28:1,2,4 31:2,14 32:11,15 33:15 39:10 43:10,11 71:24 97:6 104:8	111:16 promotion 28:14 pronounced 75:12 208:17 proper 46:16 properly 222:20 property 113:4 114:15 prosecutors 83:25 prostitution 35:13 68:18 protection 6:16 217:20 218:2 protocol 95:14 proud 145:16,20 provide 74:23 165:11 193:12 provided 12:11 100:19 165:14 169:10 179:20 187:3 provides 100:17 providing 123:25 168:8 221:8 public 2:7 125:12 238:6 239:13 241:10,18 242:15 242:23 243:23 pull 21:15 punch 121:20 purchase 45:12,13 49:10,14 purchased 240:17 purdue 1:9 204:25 205:1,4 purpose 105:16 124:24 132:23 purposes 52:8 61:2 140:6 142:14 150:7 164:5 168:20 171:14
---	--	--	---

[purposes - related]

Page 30

184:24 217:21 236:4 pursuant 237:3,6 put 18:6 24:15 47:8 79:13 82:11 83:15 97:2 115:14 122:16,20 134:2 141:19 142:16 143:20 144:1 154:19 174:14 197:22 202:1 216:5,21 218:23 puts 123:4 134:11 140:17 165:15 172:13 putting 143:11 226:15	218:17 220:7,11 221:7 225:7 questions 54:18,20 60:19,20 82:6 186:9 218:25 219:18,20 231:12 235:6,10,20,20 236:3,5 quick 50:19,20 166:2 216:20 231:5 quite 63:23	receipt 240:20 receive 22:24 95:2 113:9 114:7 193:15 215:17 221:22 222:3 received 20:4 23:1 55:25 113:21 132:9 159:6,11 177:13 185:18,22 receiving 216:19 recess 71:19 117:18 163:5 210:19 235:16 recollection 15:11 225:2,11 record 11:2,7 12:18 61:5 71:17 71:20 117:16,19 125:12 126:23 138:6 150:17 163:2 164:8 171:21 185:4 210:17,20 235:14 235:17 236:11 242:9 recording 176:22 records 129:15 redss 136:20 137:3 reduced 238:13 reed 3:3 reedsmith.com 3:6 refer 154:17 155:17 187:5 190:21 reference 152:22 189:24 240:7 241:2 242:2 referenced 151:23 230:6 238:13,17 240:11 241:11	242:15 references 152:8 referred 54:12,22 56:4 109:9 134:9 151:13 186:21 211:10 referring 67:12 102:13 151:17 157:8,9 186:6 197:5 221:3 223:17,20 reflected 165:12 refresh 15:11 regard 148:1 regarding 179:17 184:15 237:2,11 regardless 78:19 178:22 regional 135:21 136:19 registered 29:8 regular 95:12 112:15 191:7 regularly 104:7 rehab 99:16 relate 73:2 113:4 113:21 187:16 related 17:20 21:23 23:23 31:15 32:2 35:18 44:14 44:20 45:8,16 53:1,19 54:11 62:25 63:22 64:4 68:2 69:6 70:19 73:3,7,15 74:16 75:7 84:15 92:25 99:12 102:23 106:20,24,24 111:19 112:5 114:5,15 122:2,9 127:8 128:24
q	r		
qualified 47:24 233:6,14,15,18 238:8 quarter 173:20 quarterly 172:8,9 query 128:23 141:8 143:4 202:18 question 20:11 39:25 62:2 85:5 87:6,7,13 94:1,5 96:5,15 100:13 101:15,18 112:10 115:2 117:4 123:11 130:22 144:23 146:11 148:25 149:3 151:2 153:20 156:5 159:10 167:18 173:25 176:6 179:14 183:14 184:9 191:9 197:12	r 12:20 135:21 radio 129:11 rank 19:16,19 30:2,6 38:19 46:5 102:7 ranks 19:24 102:7 rapport 76:20 reach 81:2 reached 174:12,13 read 54:1 139:11 148:4 166:1 172:1 173:2 195:10 196:2 197:21 228:6 241:5,6,12 242:5,6,17 reading 240:12,20 real 166:1 216:20 really 41:21 109:11 132:22 136:1 183:5 reason 13:12 57:13 228:25 229:9 242:8 243:3 reasons 199:25 recall 15:13 28:20 76:24 103:20 168:7,11,14 223:6 223:7		

[related - responding]

Page 31

132:14 135:17,17 137:13 156:24 157:18 158:13 168:9 183:10 184:4,11 189:13 189:19 215:3,22 217:12 232:5 relates 1:8 46:13 53:25 73:7 76:10 132:5 159:21 183:23 relating 44:13 93:22 96:7 99:4 99:21 112:19 179:11 relative 200:11 239:2 relatively 119:7 releasing 18:19 relevant 53:1 relied 229:24 relieve 55:3 reliever 188:17 remember 14:8,14 21:7,21 24:3,5 25:4 26:22 27:17 28:19,24 29:2 31:17 32:3,5 37:1 40:21 46:10 48:19 53:5 56:10,18 57:15 59:12 60:14 72:24 74:2 77:1,5 77:10 78:13 84:6 96:4 98:5,22 99:1 99:3,20,24 103:7 103:24 104:1,4 106:22 109:20 126:12 128:21 131:6 136:9 146:13,13,22 147:6,8 151:24	152:1 157:21,23 158:5,16 160:6,14 167:16,21 170:18 170:19,24 171:5 175:2,23 176:3,9 176:12,16 178:14 179:3 182:1,6 183:1,8 194:3 214:20 217:15 218:19 219:2 224:4,13,16,17,18 224:19 234:7 remind 92:20 removed 16:23 rendon 97:23 151:14 renee 1:25 238:6 239:13 repeat 20:11 86:20 153:2 162:3 185:20 196:12 212:6 213:10 215:19 220:6 221:24 225:8 226:13 229:5 233:11 rephrase 136:10 replace 73:5 report 6:8,10 25:11 27:5 28:17 32:22 36:14 41:23 42:2 67:15 82:15 82:18,21 84:4,7,14 86:6 88:6 89:19 93:13 98:4 120:16 120:17,25 122:17 122:18 125:7 126:21 127:3 132:20 164:4,16 164:17 165:13 168:9,19,24	169:24 reported 25:12 36:15 42:7,15,21 165:18 186:2 reporter 5:16 241:7 reporter's 5:14 238:1 reporting 29:18 31:22 36:8 39:15 42:10 56:15 62:13 82:13 88:5 131:4 134:21 reports 39:15,16 67:22 83:21 86:9 88:1 130:19 148:5 164:20 170:2 191:7,8,10,12 194:5 195:3,13 197:21 201:6 represent 100:5 108:13 219:14 231:16 representative 229:1,10,16 representative's 229:25 representing 219:4 reputation 161:23 request 24:24 28:11 33:21 48:17 58:8 80:25 129:2 236:7 242:9,11 requested 47:10 59:22 109:22 110:9 131:11,14 237:1,6,10 requesting 17:16 requests 58:5 125:8	required 87:1,7,9 193:9 240:25 requirement 86:17,24 resident 226:10,20 228:5,12 229:24 230:2 resigned 27:15,18 180:24 resources 46:17 46:24 47:1 48:22 60:8 68:22 74:22 74:23 75:19 81:2 97:1 182:17 198:8 respect 74:16 154:7 159:10 167:19 223:9,13 223:25 224:22 respond 40:17 41:14 44:25 53:24 76:19 77:23 79:8 79:25 80:19,21 82:14 84:22 95:22 96:2 118:12,13 121:9,10 124:10 155:13 188:2 212:24 215:11 216:25 223:8 responded 23:20 40:10 93:10,13 126:1 173:19,21 187:20 234:13,22 235:3 responder 193:1 responders 192:23 responding 41:3 41:10 44:15,17 76:21 80:10,14 84:12 95:19 117:24 118:6 122:25 167:7
--	--	---	---

[responds - scene]

Page 32

responds 125:5 response 86:18 212:21 responses 76:1,19 responsibilities 18:12 23:15 25:24 26:3 29:6 35:1,3 41:4 46:12 49:21 62:19,23 63:4,12 64:4 72:2 81:11 110:14 134:18 172:24 responsibility 37:13 44:12 45:6 45:7,10 123:17 203:7,15,24 204:6 204:14,21 205:4 205:13,21 206:6 206:22 207:5,13 207:22 208:4,12 208:21 209:4,11 209:18,24 210:10 210:25 211:4,8,19 211:23 212:3,11 responsible 39:19 79:22 112:21,24 122:24 138:5 160:23 responsive 52:20 123:25 rest 182:11 result 90:2 113:6 115:5 153:16 230:9 resulted 190:25 results 145:16 retained 5:16 retire 27:14 retired 33:4 36:15 37:2 42:15	returned 240:19 review 15:8,10 86:9 227:4 237:2 237:6 240:14 241:1 242:1 reviewed 15:14,17 reviewing 185:3 218:19 rewarding 145:23 rid 200:1 right 12:23 14:14 15:13 17:22 19:9 19:23 21:3 24:8 27:4 28:17 31:6 42:22 44:10 47:4 50:22 52:19 53:6 54:22 55:14 61:13 63:1,11 65:11,19 67:13,19 71:13,15 72:3,14 85:14 86:8,19 87:22 88:19 91:1 92:22 92:23 94:15,23 95:14 101:21 103:1,10 104:11 106:19 108:11 109:15 111:23 115:15 119:4 122:23 130:5,21 131:2,15 137:6 140:3 146:5 150:24 152:4 155:3 159:5 160:7 161:8 162:24 165:11,24 166:3 166:18 167:22 168:7 169:14,19 170:9 174:16 178:25 180:19 181:6 184:14 188:7 191:5 193:6	197:18 201:17 203:6 206:4 207:21 216:11 226:16 232:12 233:13,22 234:14 ring 177:5,10 risks 222:14 228:13 rite 208:8,9,11 231:25 232:4 river 92:2 rms 134:25 202:17 robin 2:7 11:14 rocky 92:2 role 14:11 26:4 77:8,8 111:2,8 198:2 233:25 roll 116:21 rolled 143:2,14 room 70:2 129:11 235:9 ropes 3:17 12:4 ropesgray.com 3:20 ross 104:24 roughly 14:15 29:2,2 31:13 213:25 214:4 roundabout 98:19 rounded 34:2 row 123:5 rpr 1:25 rules 12:11 237:3 237:7 241:5 242:5 run 43:12 128:6 running 128:9 rwilson 2:10 rx 131:4	s s 135:21 242:8,8 243:3 safety 6:16 43:5 217:20 218:2 sal 15:2 salaries 112:14,15 112:17 salary 215:9 sale 183:11 sales 228:19 229:1 229:9,16,25 salvatore 2:3 11:9 240:5 sam 11:20 219:12 samuel 2:17 samuel.longergan 2:19 satisfaction 145:21 147:23 satisfy 155:21 156:15 satisfying 146:9 147:3,4 saved 194:13 saw 167:4 174:1 saying 149:15 153:3 154:16 198:23 says 35:8 75:12 152:17 165:21 166:6,22 167:9,14 167:19 169:6 174:17 187:4 188:10 sbadala 2:5 scenario 21:10 scene 41:22 77:20 77:21 78:11,11,25 79:18,25 80:2,3 81:6,12,14,17,21
---	--	---	---

[scene - sheriff]

Page 33

82:5,14 84:8,12,15 84:25,25 85:1,3 86:25 88:3,10,12 88:14,21 89:5 91:8 94:14 95:19 119:13,16,18,21 119:25 120:13 123:1 126:1 187:1 187:20 188:3 190:1,21,22,25 234:14,16 235:3 scenes 53:24 78:6 78:8 86:18,21 89:23 90:2 117:24 118:7 149:11 188:6 scharschmidt 77:3 schedules 44:24 scholer 2:16 11:21 219:13 school 20:22,22 87:17 schools 20:19 scibelli 181:4,5,6 script 226:7 scripts 132:21 seal 239:6 241:15 242:21 search 46:21 50:16 64:7 88:19 89:2 91:6 182:17 182:20 searched 52:3,20 123:24 season 211:14 second 28:21 34:9 36:4 103:5 123:10 170:23 171:18 185:25 187:2 188:9	secondhand 114:1 secretary 101:23 165:15 172:12 secrets 132:12 section 122:16 166:1 secure 64:8 77:21 80:2 88:21 securing 88:14 security 23:17 63:17 65:1 66:25 67:20 68:17 110:19,24 111:1,6 111:7 134:4 sedative 188:17 see 31:11 60:21 64:24 66:9 69:10 79:1 89:3 94:13 116:24 120:4 121:24 130:2 140:7 141:21,25 142:7,18,21 157:11 165:17 166:20 173:12 177:7 178:15 185:11,14 189:25 197:14 198:16,21 201:6 235:13 seeing 41:17 120:8 152:20 179:3 198:22 seen 61:14 63:25 75:25 85:24 101:12,13,19 164:19 170:1 179:1 201:2 seize 113:5 114:14 114:14 seizure 115:6 seizures 113:10 115:1	self 183:25 selling 85:4 90:5 90:12,20 177:14 202:16 211:3 send 50:19 138:21 188:2 236:7 sending 94:19 sends 174:8 191:15,19 201:7 senior 39:21 sense 63:19 119:21 148:3 173:18 200:9 sent 78:23 103:11 137:21 138:12 186:4 sentence 152:17 153:5 186:5 188:9 189:23 sentenced 22:18 sentencing 22:16 22:17 separate 63:8 88:1 separated 202:22 separately 74:13 september 185:6 185:24 sergeant 20:1 25:13,19 27:1,5 28:2,5,23 30:2,6 31:14,20 44:3,7 45:5,5 66:4 67:8 67:11,13,14,16,22 68:9 69:3,15 92:19,20,21,22 115:12,19,21 133:13 167:24 170:6,9,21 172:23 182:7 192:8,10 216:15,21	sergeant's 123:16 sergeants 147:16 171:2 215:17 served 92:25 96:6 108:20,22 233:25 session 5:12 164:11 set 22:13 40:11 75:2 95:1,11,20 103:4 105:5,24 153:5 239:5 sets 68:25 setting 44:13,19 seven 214:4 sex 28:25 29:6,8,9 29:12 shannon 94:17 150:20 152:9,9,10 191:15 share 144:1 shared 123:19,22 123:24 131:16 sharing 136:20 139:9 140:13 141:2,23 142:3,15 143:21 160:10,12 192:13 198:8 sharp 43:17,21 45:3 62:13,14 63:6 64:12 69:4,9 169:6 sheet 242:7,10,18 243:1 sheriff 18:8 19:17 19:21,24 23:14,24 25:17,25,25 27:23 30:3,7 36:16,17,20 36:22 39:5,7,7,16 42:10,16,19,22,23 42:24 51:13,14 96:22 100:4 108:4
---	--	--	--

[sheriff - sort]

Page 34

108:12,16 151:21 sheriff's 6:5,8,9,11 12:24 18:3 22:7 25:20 27:10,21 29:7 37:5 41:25 42:20 43:3,22 44:13 45:8 46:8 51:18 57:3,8 58:8 59:11 60:20,25 61:11,19,22 62:4 62:10 63:21 65:23 66:12 68:24 70:18 71:5 73:1,14,20 74:17 76:9 78:5 79:3 80:9 89:22 90:9 92:3,9 93:9 93:15,21 94:24 95:15 96:20 99:25 100:16 101:12,14 101:23 102:3 103:21 108:2,13 109:23 110:12 112:4,5,14,16 113:3,19,20 114:7 114:13,21 115:4 116:3,4,6,12,13,20 117:6 118:1,6 122:3 125:25 127:17 129:6,6,16 130:6,12,23 131:7 131:12,17,22 134:13 135:15 136:14 137:2,12 138:2,4 139:19 140:17 141:6,8 142:16 144:9,21 159:24 161:9 162:11 164:3,15 164:19 165:15 168:18,24 171:10 171:23 172:5,16	174:9,19 177:13 177:20 179:10,15 180:1,9 181:7,22 182:23 183:9,17 184:2,10 187:20 188:1 189:2,12,20 191:11 192:4,25 193:6,12 201:18 202:11,13 212:22 213:3 215:2 216:13,14 217:10 232:10 235:2 sheriffs 96:10,10 sherriff 100:13 shift 95:23,24 shifting 101:9 shipment 194:3 shkolnik 2:2 11:10 shop 203:21 shopping 161:6,11 200:5 show 63:24,25 80:5 81:10 121:7 143:6 shows 142:13 side 118:21 227:11 227:18 sides 218:6 sign 45:15 signature 237:5 239:12 240:14 signed 146:1 241:13 242:18 significant 146:16 signing 240:12,20 similar 152:6 169:1,3 185:15 simple 160:25 191:25 sincerely 240:23	single 226:6,18 229:22 sir 31:17 131:5 133:22 150:22 154:23 164:21 165:7,23 166:7,21 170:7 172:6 175:3 175:16,25 176:24 177:4,11 185:11 185:14 186:15 188:12,20,23 190:5 192:19 193:2 195:1 201:3 201:16 203:5 204:12,19 205:19 206:9,25 207:11 209:2,9,14,21 210:2 219:6 221:18 222:6,11 222:17,22 223:2 223:12,24 224:25 226:5,13 227:15 227:21 228:1,17 229:14,21 230:5 230:15 232:8,13 232:23 233:1,5,9 234:15 235:6 236:10 240:10 sit 89:16 228:24 229:8 sitting 173:8 situation 119:17 221:11 224:6,9 six 19:8 47:4 192:1 skip 189:25 slides 57:20 small 29:20 49:15 smaller 81:1 118:20 smith 3:3 62:21 69:10 207:9,10,13	social 134:4 sold 81:25 141:4 147:24 157:9,14 179:20 solely 215:21 solutions 2:15 240:1 243:1 solve 120:10 somebody 62:18 70:23 85:16 98:7 144:13,14 145:21 157:5 177:21 200:11 233:7,17 somebody's 123:20 160:3 someone's 134:2 son 156:3 157:14 sorry 16:6,10 19:3 19:6 20:11 36:5,8 36:20 62:1 65:3 74:11 80:15 84:25 85:5 86:20 87:24 91:17 96:4 109:6 123:10 126:13 141:7 151:8 153:2 156:5 162:4 166:5 168:11 170:23 173:7,24 176:5 184:1 185:20 186:25 191:9 213:25 215:19 sort 16:16 37:13 56:2,2 63:2 65:22 72:6 73:2 82:3 113:19 120:19 121:3 122:10 128:24 145:3 153:17 162:14 191:23 194:5 215:21
--	---	---	---

[sorts - sub]

Page 35

sorts 16:19 17:2 26:9 85:7 137:25 sound 27:4 169:18 235:24 sounds 95:16 156:8 south 17:24 speak 84:18 136:1 147:22 149:15 speaking 148:12 155:12 223:7 special 95:7 216:3 specialty 18:18 specific 56:1 86:9 87:16 107:16 116:13 128:24 157:23 176:12 177:18 201:25 223:19 232:4 specifically 71:1 74:8 78:13 109:24 133:5 157:4,13 169:2 181:11 191:3 231:20 specifics 99:1 160:20 224:19 specified 238:20 specify 106:9 speed 40:13 spell 36:11,24 77:2 130:17 spelled 12:20 spent 35:17 spit 191:9 spoke 59:20 131:2 186:22 213:5 224:1 232:18 spoken 54:5 spot 42:20 spreadsheet 122:11,21 123:3,7	124:4,9,16,21,25 125:1,18,24 126:10,18 127:6 202:21 spreadsheets 122:6 square 2:7 3:4 ss 238:3 staff 101:24,25 102:7,10,11,12,12 102:23 103:2,15 103:19,20,25 104:2,6 114:3 staffing 47:8,18 215:6 stage 137:1 221:12 stance 107:19 108:3,6,13 stand 83:1 98:3 119:4 147:2 standard 82:2 standards 47:22 standing 98:5 107:19 146:14 147:6,8 stands 19:2 130:18 192:17 start 11:8 20:20 42:13 70:13 81:21 88:12 125:15 148:13 154:10 192:21 194:16 started 40:9 41:3 46:8 80:13 143:22 181:21 231:1 starting 67:25 146:24 stat 135:1 142:14 state 12:18 17:5,6 114:7 135:1,4 178:12 179:2	185:4 191:1 192:2 210:3,3,9 238:2,7 239:14 241:10 242:15 stated 47:5 156:13 216:2 228:21 230:19,21 statement 195:22 229:17 241:13,14 242:19,19 statements 86:14 229:2,11 states 1:1 stating 115:14 192:1 stations 69:22 statistic 202:21 statistically 138:9 statistics 92:11,14 125:2 135:5,6 191:17 194:11 stats 138:12 191:25 194:15 status 128:13 134:6 stay 49:23 staying 101:10 stealing 27:20 steel 104:21,22 stemmed 93:15 stems 149:9 stenotypy 238:14 step 32:10 stings 35:13 68:18 stood 122:19 167:17 stop 30:25 70:25 128:2 146:10 stopper 137:18 178:4	stoppers 137:8,20 138:10 store 70:2 stored 127:9 stories 155:24 194:13,15 story 155:16 171:18 174:10,15 178:15 179:1,4 strategic 6:15 65:22 217:19 218:1 strategies 44:19 strategy 44:18 stream 3:2,17 4:2 street 2:17 3:4,8 3:13 4:4 26:8 58:19 121:10,12 140:9 155:20 197:25 strictly 126:4 strike 96:13 226:7 string 6:6,13 150:5 184:22 stronger 188:16 studies 159:14 study 159:7 stuff 18:19 26:8 35:13 45:14 49:4 49:10,11 53:23 58:21 71:7 75:21 84:4,10 85:20 87:17 89:7 96:2 99:12 107:14 116:1 120:21 128:12 134:11 135:8 148:13 194:14 197:22,23 215:10 sub 116:20
--	--	--	---

[subject - talked]

Page 36

subject 16:22 98:25 144:8 235:24 subjects 75:23 submit 88:6 117:10 138:2 174:10 submitted 24:23 84:14 86:7 102:19 120:16 169:7 172:12 173:4 subordinate 15:24 16:12 subordinates 25:16 subscribed 241:10 242:14 243:21 subset 124:7 substance 189:18 233:4,8,17 suburb 13:6 suburbs 118:20 successes 144:20 sued 231:18,22,25 suggestions 182:22 suicide 177:9 suing 53:11 suit 216:5 suite 1:21 2:8 3:4 240:2 superior 240:1 supervised 23:5 supervising 18:16 32:10 supervision 72:8 supervisor 15:24 16:1 25:10,13 27:8 45:4 48:15 66:4 67:8 68:10 81:10 92:17,17	103:17 123:16 137:21 138:22 170:15,20 178:5 192:8 supervisors 39:14 44:23 45:1 67:9 79:21 123:9 124:22 186:24 supplement 88:6 120:17,25 supplemental 120:15 supplied 167:25 193:22 217:9 supplies 45:14 supply 161:25 supplying 193:24 211:18 suppose 81:5 supposed 81:13 85:13 103:14 141:5,13 142:2 143:10 149:11 sure 13:21 24:2,3 29:14 30:9 34:11 41:9 42:13 46:15 51:4 55:1 59:13 59:22,24 61:25 64:8 65:24 71:16 73:10,12 76:6 87:6 88:12 94:19 95:15 96:12 105:1 110:21,23 112:7 116:8 117:15 119:3 120:23 123:17 137:4 138:16 147:22 153:19,21 156:8 166:3,18 168:3 170:3 172:2 173:6 173:23 183:13	185:9 192:10,14 193:18 196:3,14 197:12 216:10 218:4 220:7 221:25 229:7 231:14 233:12 surgery 220:19 surprise 108:25 survey 78:25 suspect 66:8 140:8 140:21 141:2,3,15 142:1,6 suspect's 140:12 suspected 23:23 41:13 77:17 79:10 79:18 186:25 216:6 suspicious 183:21 183:22 184:4,12 184:15 swapped 33:23 swat 63:22,23 64:3 64:10 68:3 75:18 75:19 76:5 switchboard 138:15 switched 33:19,24 71:25 switching 72:13 sworn 12:9,13 238:10 241:10,13 242:14,18 243:21 syringe 190:14 system 29:9 56:15 82:22,24 83:3,4,12 83:14 84:2,3 121:5,17 126:24 126:24 127:1,15 129:15 130:19 131:4 134:21,25 135:10,22 136:20	143:20 144:3 202:17,19,24 systems 121:4 209:8,11 t t 65:11 82:25 168:4 tab 184:18 table 98:19 tac 82:25 83:13,14 83:22 84:2,3 86:7 120:16 121:5 122:1 127:1,6 129:23 130:2 134:25 135:10 144:3 203:1,2 take 33:10 34:13 71:14 72:19 80:5 85:1 102:13 104:21 117:13 118:3 143:7 150:10,17 162:25 171:16 175:17 180:14 210:14 211:9,22 216:9 235:12 taken 1:19 21:18 47:6 87:4 104:24 122:17 160:2,19 163:5 238:19 240:11 takes 38:14 101:24 talk 16:9 54:11 60:11 75:8,17 78:9,10 98:10 101:8 110:7 119:19 120:11 144:19 147:15,18 147:20 talked 15:21 16:14 31:8 54:15 60:16
---	--	---	---

[talked - think]

Page 37

63:18 68:3,3,4 77:4 96:9 98:11 99:2,3 101:6 119:12 121:25 127:5 139:22 156:18,20 157:12 174:24 175:24 182:10 talking 17:19 42:11 49:20 59:19 73:22 74:4,8 80:14 88:10 98:19 117:23 132:19 149:20 175:9 210:23 219:24 223:10 talks 190:3 tape 80:3 tara 172:12 173:4 174:8 task 57:11,21 58:7 59:6,11,25 63:15 64:13,15,19,23 65:5,7,23 66:6 67:6 68:3,22 74:10,12 92:25 96:7,7,11,17 97:4 97:12,19 98:23 99:21 100:3,9,17 105:9,16 106:2,6 112:6,7,13,18,19 113:5 118:22 132:3,15 142:19 142:20 144:17 148:5 152:3 161:15 170:18 178:10 180:16,17 181:14 182:9 183:4,4 199:18 216:16	tasked 95:19 taylor 16:2 42:3,4 42:6,25 54:9,10 108:16 team 29:21 165:5 212:21 technically 182:2 technique 49:16 182:24 183:6 technology 49:2,7 49:18 89:1 telephone 3:17 4:2 49:11 tell 32:14 52:7 89:19 155:23 158:8 167:22 169:16 220:24 221:4 ten 214:4 234:9 tenth 3:13 term 109:5 115:5 145:20 159:20 161:5,17,18 162:6 188:4 190:13 200:6 terminal 128:5 129:10 terms 15:22 44:14 44:18 46:24 49:22 65:24 72:15 75:6 84:6 85:12 88:8 89:10 131:22 142:2 147:10 153:24 169:19 172:10 194:6 197:7,7 198:13 199:1 200:10 201:9,12 202:5 218:25 test 226:15	testified 13:15,18 13:24 14:3,10 16:15,17 17:1,4 73:24 93:3 131:3 132:13 222:23 223:3 224:1 225:1 225:10 230:8 232:9 233:20 234:12,15 testify 238:10 testifying 13:9 17:11 53:7 testimony 13:13 14:15 16:15 123:2 158:18 218:25 223:6 238:12,16 241:6,7 242:6,9,12 teva 4:2 209:15,18 text 50:20 51:11 51:23 95:2,12,13 150:18 191:23 texts 51:10 thank 18:23 20:8 119:5 171:22 176:25 219:6,7 231:6,7 235:6,7,22 236:10 thanks 231:11 theft 160:1 199:25 200:3 theirs 119:11 thing 39:6 66:10 67:7,22 79:17 119:12 128:10 129:17 134:4 141:22 143:23 158:20 186:2 things 17:2 21:16 39:18 54:4 62:7 81:9 115:7 121:13 216:10	think 27:7 28:21 30:20 34:1 36:15 36:16 38:16 42:8 56:15 58:21,24 62:7 63:18,22 64:11 69:2 70:21 72:20 77:9,13,14 77:22,24 78:2 82:10,11 83:10,19 84:9 86:10 87:14 99:7 101:5,7 103:7,8 104:25 105:5,18 113:1 118:9,18 125:21 126:7,21 127:25 129:5 130:18,21 133:4 135:5 136:4 138:9 139:12 144:7 145:24 148:4,10,14 149:14,16 151:13 151:23 154:13 155:13,15 156:12 157:8,20 158:19 160:15 166:6,10 166:12,23 171:1 172:11 174:8,25 175:5 177:17 181:1,20 182:21 184:6 185:11,15 186:6,22 189:7 190:15 192:17 193:23 194:11,22 194:23 195:1 197:11 198:6,7,17 199:22 200:8 205:10 206:2 211:7,9,10 212:14 215:1,24 216:2,11 216:20 234:15 235:25 236:3
--	---	--	---

third 196:10	175:10 188:15	town 115:25	transcript 5:1
thirty 240:19	194:6 234:17	townships 79:8	237:3,6,9,11
thomas 185:6	236:7	118:10	240:11,16 241:5
thought 125:14	tip 132:5,10	toxicology 93:12	241:12 242:5,11
178:21	133:11 137:22	126:21 127:3	242:17
thoughts 73:25	138:2,16 161:13	192:2 232:25	transcription
98:4	177:13,18,20,25	trac 202:25	238:16
three 3:4 15:7	178:2,4,8	trace 121:14	transported 23:18
20:22 105:6	tips 132:1,8 133:9	147:23	trauma 21:10
214:22	137:12,16,19,22	traced 155:14	232:12,16
ticket 24:4 32:8	138:1,6,11,20	track 56:19 92:4,8	treat 80:1
tier 29:9	139:4	117:9 122:7 125:2	treatment 99:6,10
ties 156:12 195:2	tipsoft 137:6,7	125:3,15 126:24	99:14,17 233:3
till 37:12	title 38:24 46:6,7	127:12 135:5	trend 153:23,24
time 14:3 18:25	64:21 212:25	202:10	154:2
22:14 24:23 25:13	titles 39:8	tracks 131:21	tri 19:1,2
26:22 27:6 28:18	today 13:13 14:22	trade 75:23	trial 22:13 177:8,9
28:25 29:20 30:7	15:25 37:12 39:8	traffic 35:12 68:18	trick 109:12
32:1 33:12 34:13	42:3 53:8,13,15	70:24 128:2,16,17	tried 36:6
35:17 36:21 37:10	54:14 61:22 62:5	trafficking 64:20	trigger 151:7
40:16 41:5 42:9	123:21 147:10	105:9 177:3,14,21	triggers 94:13
42:17,18,21 45:3	198:15,16 219:24	195:14 202:4,15	151:3
49:19 53:5,20	222:23 228:24	216:16 217:5	true 224:22
77:24 102:20	229:8 231:12,17	trained 84:23,24	238:16
103:11 107:12,17	today's 11:2	85:6 87:12 144:15	trust 115:11
117:13 118:10	told 28:12 33:22	training 20:5,10	truth 238:10,11,11
141:15 144:25	38:7 42:3 65:8	20:13,17 21:8,10	truthful 13:13
146:17,24 150:20	131:6 148:12	21:10,11,12,14,18	32:9
152:17 153:13	231:4	23:8,11 38:13,15	try 36:3 82:1 85:9
162:20 168:15	tool 140:7 141:18	56:1,2,5,7,9,11,19	85:17,20 86:2
170:22 173:1	top 147:14 165:4	57:9 87:16 115:24	87:1 89:2,4,8
178:6 181:25	166:1 188:8	115:25 134:9,10	98:21 119:19
182:4 189:7	topic 31:10	143:1 144:18	120:5 140:7 141:2
196:13 197:3	topics 101:10	159:6,12,13	141:20 146:15
219:6 231:8	tops 57:18	193:12,14,15	157:8 182:25
233:24 234:7,8	totals 165:20	232:10,11,14,15	189:8 191:9
235:23 238:19	169:3	232:16,18,19,21	199:24 233:13
times 13:20,21	touched 199:22	232:24 233:2	trying 16:24 34:10
17:1 56:11 59:20	touches 63:21	transcribed	63:19 86:1 89:7
80:20 100:22	tough 120:10	238:15 241:7	91:11 109:11
105:6 107:17			115:3 118:4 120:4

123:12 132:11,18 139:12 143:8 147:11 153:4 170:24 183:6 189:3 190:15 202:10 tuesday 103:5 turn 89:13 105:6 124:13 132:2,15 132:23 155:19 161:14 180:15 184:7 211:13 turned 104:13 turning 105:4 tv 63:24 twelfth 3:8 two 17:3 27:25 29:4,16 42:1 51:16 57:25 58:10 64:17,24 65:8 81:7,8,8 88:1,2 95:18,22 102:10 105:5 110:3 115:24 119:3 180:21 181:1 188:2 213:18 215:10 219:14 230:8,21 235:12 twombly 166:11 168:4 169:11 type 41:16 58:17 70:6 78:19 106:6 112:22 132:1 135:2 143:17,19 147:11 149:8 156:1 178:8 187:23 197:7 202:18,22 216:3 types 13:23 15:16 70:5 148:2	typing 94:21 u u.s. 97:22 151:17 underlying 155:16 underneath 67:25 understand 13:7 54:24 73:11 105:15 108:15 115:2 142:18 153:19,21 156:8 161:19 165:17 177:8 182:14 183:13 197:12 226:24 228:13 understanding 53:10 55:24 106:2 108:11 143:3 152:21 158:18 188:14 192:22 197:19 198:12 199:3,19 219:22 understood 55:11 123:2 unfortunately 30:1 uniform 32:17 33:18 34:6,15 109:22 181:10 uninvited 188:1,4 union 30:11,14,16 30:21 31:7 215:14 unionizing 30:10 unique 121:3 unit 29:1,6 34:1,3 34:4,4,5,8 35:7,10 35:11 38:12,13 40:9 44:8,23 45:2 59:13 63:8,13 64:3,10 67:9,12 68:5,6,8,12,25 69:13,13 76:13	92:12,17 93:23 94:12 160:22 166:12,14 169:20 170:10,12,17 172:24 178:6,6 197:16 234:20 united 1:1 units 35:14 63:20 67:25 69:5 70:18 75:10 174:9 untangle 195:23 196:5,16 unwanted 69:20 update 45:22 123:16 updated 72:21 updates 103:18 155:25 updating 191:16 ups 80:6 use 50:22 51:11,20 52:16 60:22 77:18 83:11 129:22,22 129:23 134:17 135:15 136:3,3,13 136:15 140:6 143:15 156:10 158:20,20 159:1 159:12,15 187:10 187:16 193:13 216:21,24 217:1 219:24 220:4,9 221:16 223:16 224:2 225:22 227:11,19 230:18 235:1 user 159:3 uses 136:13 139:20 200:12 220:9 224:24	usually 38:11 45:18,19 53:19,24 69:21 78:21 79:16 80:25 92:16 98:6 99:9 100:4 103:7 132:2 149:7 191:15 v v 1:9 36:25 240:6 241:3 242:3 vacation 96:1 valid 128:14 value 114:25 variety 137:19 various 19:24 20:17 21:16 199:4 199:20 vary 96:1 vehicle 14:2 vehicles 79:25 215:9 216:8,9 217:9 verifications 29:12 veritext 3:2,17 4:2 240:1,7 243:1 versa 60:9 182:19 183:2 versus 137:19 138:17 200:14 vest 112:22 vice 35:11 60:8 68:5 182:19 183:2 victim 149:12 235:2 victim's 140:11,17 140:21 victims 175:2 201:11 videographer 4:7 11:1 12:8 71:17 71:20 117:16,19
--	--	--	---

[videographer - yeah]

Page 40

163:2 164:8 210:17,20 235:14 235:17 236:11 videotaped 1:13 view 125:8 131:20 131:25 154:5 198:2 203:6,14,24 204:5,20 205:3,12 205:20 206:4,20 207:4,12,21 208:3 208:11,20 209:3 209:10,17 211:2 212:1 violence 135:8 virtual 3:2,17 4:2 volleyball 31:8 volunteer 24:12 volunteered 24:13	164:22,23 165:16 166:3,17,18 169:1 172:25 189:8,17 218:10 226:14,16 232:18 wanted 66:14 110:10 123:20 218:8 wants 156:24 172:18 warning 226:25 227:5,9,16,23 228:6 229:18 warrant 35:7 44:8 50:16 64:7 89:2 91:7 128:18 170:10 182:18,20 warrants 29:21 35:9 46:21 128:19 138:18 washington 3:9,14 watson 204:18,21 way 44:23 48:9 50:12 53:6 65:25 68:17 87:20 94:23 113:4 118:3,9 149:25 156:15 157:11 162:23 172:4 190:15 196:25 198:13 225:14 233:7,16 ways 104:20 137:19,25 199:4 199:20 200:7,15 202:5 wc.com 3:10 we've 44:22 47:6 53:22 58:9 59:13 63:18 86:22 93:13 96:12 104:24 125:4 194:11,13	199:21 202:1,22 212:23 214:13 215:7 219:23 web 232:21 website 137:23 178:5 193:16 232:22 wednesday 103:8 103:9 week 90:4 120:13 191:16 weekend 192:2 weigh 104:17 welfare 85:17 120:1 went 18:25 20:20 21:9 27:12 29:21 30:2 31:12 83:20 124:17 136:11 144:17 214:17 west 2:17 13:2 westlake 118:19 wf 190:6 whatsoever 73:6 102:23 whawkins 3:10 whereof 239:5 white 190:6 william 12:1 williams 3:7 wilson 2:7 11:14 11:14 wing 38:14 wiring 49:16 wise 34:5 withdraw 39:25 withhold 120:21 witness 12:8 36:5 61:8 86:14 158:2 219:7 231:6 235:7 237:2 238:9,13,14	238:17 239:5 240:8 241:1,4,11 242:1,4,15 witnesses 81:17 85:13,14 women 95:18 word 73:5 193:7 words 126:1 142:17 work 12:22,23 13:1 16:8 22:5 26:23 51:21 52:16 58:17 91:19 109:23,24 121:8 135:16 142:19,21 152:12 199:17 worked 18:9 91:20 170:11 working 58:11 135:7 141:20,22 143:12 189:3 works 33:4 77:15 94:18 95:23 166:13 worry 207:17 write 82:15,19 writing 32:7 72:15 84:4 88:5 132:21 written 175:19 200:13 212:1,9 wrong 123:6 148:4 wrote 24:4 226:9
w			x
w 3:12 168:4 wait 30:20 89:18 169:14 waived 240:13,21 walgreens 207:19 207:20,22 232:1,5 walk 79:2 walmart 2:11 11:24 203:19,20 203:21,22,23 231:16,18,20,22 232:4 want 32:8 48:16 49:7 55:22 60:19 61:9 68:21 71:23 78:4 82:20 87:15 96:11,24 98:20 101:8 118:2 140:10 143:1 147:21 152:5 155:25 156:1,2,7 156:22 157:3			x 182:24 xx2016-03490 187:4
			y
			y 168:4 yeah 16:6 21:5 22:22 30:23 36:16

[yeah - zipp]

Page 41

46:15 51:16,19,19	z
55:1 56:7 60:1,2	zipp 3:12 11:18
75:8 76:6 80:23	
83:4 84:20 85:2	
87:5 90:10 97:21	
102:5 103:6	
105:14 109:5	
110:24 119:22	
120:24 127:2,2	
129:1 133:13	
143:14 146:10	
157:20 158:5	
166:23,24 169:22	
170:25 171:5	
172:17 175:22	
182:15 186:22	
188:5 190:22	
194:9 195:1	
198:16,24 202:8	
206:14 211:22	
213:4 214:2 236:6	
year 14:9 21:11	
22:13 29:4 37:3	
56:12 83:18 105:6	
109:20 113:12	
125:19 126:5	
154:13 176:8	
years 27:25 29:24	
37:3 41:7 43:9	
60:15 65:16	
111:17 128:18	
136:8 166:2 181:1	
190:4 213:23	
214:4,22 234:9	
yesterday 14:25	
54:14	
york 2:4,4,18,18	
3:19,19	
young 155:21	

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF SEPTEMBER 1, 2016. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.